

Proposal to amend UN GTR No.15

The modifications to the current text of the Regulation are marked in bold for new or strikethrough for deleted characters.

I. Proposal

Annex 1, Paragraph 8., amend to read:

"8. Cycle modification

This paragraph shall not apply to OVC-HEVs, NOVC-HEVs and NOVC-FCHVs. **At the request of the manufacturer and with approval of the responsible authority, an NOVC-HEV where the maximum rated engine power represents the maximum vehicle power rating, may apply the downscaling procedure described in paragraph 8.2.. The manufacturer shall demonstrate to the responsible authority that the electric machine does not impact the maximum vehicle power."**

II. Justification

1. NOVC-HEVs are not permitted to be downscaled within WLTP due to presumed unknown peak power values.
 2. Within some mild HEV systems, the electric propulsion system does not impact peak vehicle power, therefore peak vehicle power is known and identical to peak engine power.
 3. Example: High roadload vehicles without power capability to drive WLTC
 - a. ICE and mHEV vehicles that are identical except for difference between ICE and mild hybrid systems will be driven differently on WLTC.
 - b. ICE variant will drive the downscaled cycle, and mHEV variant will drive the full WLTC, leading to longer periods of full throttle / full power drive due to inability to reach high speed sections.
 - c. The full drive cycle is not representative for the mHEV NOVC-HEV variant leading to non-comparative results between mHEV and ICE and is unrepresentative of the true mHEV emissions capability.
 4. To resolve the issue outlined in point 3, the method of downscaling can and should be applied for NOVC-HEV vehicles where peak engine power is equal to peak vehicle power.
 5. Justification of power equivalence must be provided to the responsible authority for approval.
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