

## Proposal to amend Working Documents ECE-TRANS-WP29-GRPE-2021-21 (proposed 02 series of amendments to UN-R 154) and ECE-TRANS-WP29-GRPE-2021-22 (proposed 03 series of amendments to UN-R 154)

This document aims to:

- apply the approach to use the number of CD cycles from vehicle for the EAER calculation (approach already implemented for e.g. Annex B8, 4.3.1.: EC<sub>AC,CD</sub>)

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

### I. Proposal

*Annex B8, Paragraph 4.4.3. of 02 and 03 series; amend to read:*

"4.4.3. Charge-depleting cycle range ~~for OVC-HEVs~~

The charge-depleting cycle range R<sub>CDC</sub> shall be determined from the charge-depleting Type 1 test described in paragraph 3.2.4.3. of this annex as part of the Option 1 test sequence and referenced in paragraph 3.2.6.1. of this annex as part of the Option 3 test sequence. The R<sub>CDC</sub> is the distance driven from the beginning of the charge-depleting Type 1 test to the end of the transition cycle according to paragraph 3.2.4.4. of this annex.

**In the case that the interpolation method is applied, the transition cycle of vehicle L n<sub>veh,L</sub> shall be used for the R<sub>CDC</sub> determination. If the transition cycle number driven by vehicle H, n<sub>veh,H</sub>, and, if applicable, by an individual vehicle within the vehicle interpolation family n<sub>veh,ind</sub> is lower than the transition cycle number driven by vehicle L, n<sub>veh,L</sub>, the confirmation cycle of vehicle H and, if applicable, an individual vehicle shall be used as the end of the transition cycle."**

*Annex B8, Paragraph 4.4.4.1. of 02 and 03 series; add at the end of paragraph:*

"4.4.4.1. Determination of cycle-specific equivalent all-electric range

The cycle-specific equivalent all-electric range shall be calculated using the following equation:

For Level 1A;

$$EAER = \left( \frac{M_{CO_2,CS,declared} - M_{CO_2,CD,avg} \times \frac{M_{CO_2,CD,declared}}{M_{CO_2,CD,ave}}}{M_{CO_2,CS,declared}} \right) \times R_{CDC}$$

For Level 1B;

$$EAER = \left( \frac{M_{CO_2,CS,ave} - M_{CO_2,CD,avg}}{M_{CO_2,CS,ave}} \right) \times R_{CDC}$$

where:

EAER is the cycle-specific equivalent all-electric range, km;

M<sub>CO<sub>2</sub>,CS,declared</sub> is the declared charge-sustaining CO<sub>2</sub> emission according to Table A8/5, step No. 7, g/km;

$M_{CO_2,CD,avg}$	is the arithmetic average charge-depleting CO <sub>2</sub> emission according to the equation below, g/km;
$M_{CO_2,CD,declared}$	is the declared charge-depleting CO <sub>2</sub> emission according to Table A8/8, step no. 14, g/km;
$M_{CO_2,CD,ave}$	is the arithmetic average charge-depleting CO <sub>2</sub> emission according to Table A8/8, step no. 13, g/km;
$R_{CDC}$	is the charge-depleting cycle range according to paragraph 4.4.3. of this annex, km;
$M_{CO_2,CS,ave}$	is the arithmetic average charge-sustaining CO <sub>2</sub> emission according to Table A8/5, step No. 6, g/km;

and

$$M_{CO_2,CD,avg} = \frac{\sum_{j=1}^k (M_{CO_2,CD,j} \times d_j)}{\sum_{j=1}^k d_j}$$

where:

$M_{CO_2,CD,avg}$	is the arithmetic average charge-depleting CO <sub>2</sub> emission, g/km. In the case of more than one charge-depleting test, the additional arithmetic average of each test shall be calculated;
$M_{CO_2,CD,j}$	is the CO <sub>2</sub> emission determined according to paragraph 3.2.1. of Annex B7 of phase j of the charge-depleting Type 1 test, g/km;
$d_j$	is the distance driven in phase j of the charge-depleting Type 1 test, km;
$j$	is the index number of the considered phase;
$k$	is the number of phases driven up to the end of the transition cycle n according to paragraph 3.2.4.4. of this annex.

**In the case that the interpolation method is applied, k shall be the number of phases driven up to the end of the transition cycle of vehicle L  $n_{veh\_L}$ . If the transition cycle number driven by vehicle H,  $n_{veh\_H}$ , and, if applicable, by an individual vehicle within the vehicle interpolation family  $n_{veh\_ind}$  is lower than the transition cycle number driven by vehicle L,  $n_{veh\_L}$ , the confirmation cycle of vehicle H and, if applicable, an individual vehicle shall be included in the calculation."**

*Annex B8, Paragraph 4.4.6.1. of 02 series; add at the end of paragraph:*

"4.4.6.1. Determination of cycle-specific equivalent all-electric range

The cycle-specific equivalent all-electric range shall be calculated using the following equation:

$$EAER = \left( \frac{FC_{CS,declared} - FC_{CD,avg} \times \frac{FC_{CD,declared}}{FC_{CD,ave}}}{FC_{CS,declared}} \right) \times R_{CDC}$$

where:

EAER	is the cycle-specific equivalent all-electric range, km;
$FC_{CS,declared}$	is the declared charge-sustaining fuel consumption according to Table A8/7 Step 5, kg/100km;
$FC_{CD,avg}$	is the arithmetic average charge-depleting fuel consumption according to the equation below, kg/100km;
$FC_{CD,declared}$	is the declared charge-sustaining fuel consumption according to Table A8/9a Step 11, kg/100km;

$FC_{CD,ave}$  is the arithmetic average charge-depleting fuel consumption according to Table A8/9a, step no. 10, kg/100km;

$R_{CDC}$  is the charge-depleting cycle range according to paragraph 4.4.3. of this annex, km;

and

$$FC_{CD,avg} = \frac{\sum_{j=1}^k (FC_{CD,j} \times d_j)}{\sum_{j=1}^k d_j}$$

where:

$FC_{CD,avg}$  is the arithmetic average charge-depleting fuel consumption, kg/100 km. In the case of more than one charge-depleting test, the additional arithmetic average of each test shall be calculated;

$FC_{CD,j}$  is the fuel consumption of phase j of the charge-depleting Type 1 test, kg/100km;

$d_j$  is the distance driven in phase j of the charge-depleting Type 1 test, km;

j is the index number of the considered phase;

k is the number of phases driven up to the end of the transition cycle n according to paragraph 3.2.4.4. of this annex.

The considered phase j shall be the applicable WLTP test cycle only.

**In the case that the interpolation method is applied, k shall be the number of phases driven up to the end of the transition cycle of vehicle L,  $n_{veh\_L}$ . If the transition cycle number driven by vehicle H,  $n_{vehH}$ , and, if applicable, by an individual vehicle within the vehicle interpolation family  $n_{vehind}$  is lower than the transition cycle number driven by vehicle L,  $n_{veh\_L}$ , the confirmation cycle of vehicle H and, if applicable, an individual vehicle shall be included in the calculation."**

## II. Justification

1. Paragraph 4.4.3. also applies to OVC-FCHVs in Level 1A and therefore the limitation to OVC-HEVs should be deleted as this is a simple and straight forward solution to make it clear and to avoid any complex wording to explain that OVC-FCHVs just for Level 1A.
  2. Recommendation to apply the number of CD cycles from vehicle L also for EAER
    - a. Interpolation method working for the  $R_{CDC}$  difference of 1 cycle (between VH and VL) but manufacturer need to add a safety margin that is not caused by physical energy but by the calculation method (lesson learned)
    - b. Approach already implemented for all further interpolated charge-depleting values e.g. for  $EC_{AC,CD}$  (Annex B8, §4.3.1.).
    - c. The implementation of the vehicle L approach has not be done for EAER in the first step but should be integrated in the next step (based on the lesson learned)
    - d. An additional argument for the implementation of this approach is the cross-link of EAER into the “In-Vehicle-Battery-Durability GTR” (although range monitor is in monitoring for phase 1). An identical number of CD cycles for EAER calculation provides a clear and robust reference if a reference to the number of CD cycles during homologation is required. Nothing which is clear now but in case it is needed, that change will be also driven by that.
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