

Automakers' Frequently Asked Questions About the Pennsylvania Clean Vehicles Program

- Q. By what method is the Nonmethane Organic Gasses (NMOG) fleet average calculated?**
- A. An automaker's NMOG fleet average is calculated in accordance with the procedures in Title 13 CCR Chapter 1, Section 1961 except that all calculations are based on the vehicles produced and delivered for sale in Pennsylvania and not California.
- Q. By what method are NMOG credits and debits calculated?**
- A. NMOG debits and credits are calculated in accordance with the [procedures](#) required in State of California, Title 13 CCR, Chapter 1, Section 1961(c)(1).
- Q. How are NMOG credits applied to determine compliance with the NMOG fleet average?**
- A. NMOG credits are applied in accordance with CARB procedures for any model year for which NMOG compliance is being determined. For model years 2008, 2009 and 2010, automakers may apply credits generated in any of those model years as if they were generated in the model year to which they are being applied. For example, a credit generated in model year 2010 could be applied to demonstrate NMOG fleet average compliance for model year 2008 as if it were generated in model year 2008.
- Q. What reports are due to DEP as part of the Pennsylvania Clean Vehicles (PCV) program and when are they due?**
- A. [Section 126.432](#) (relating to reporting requirements) of the PCV program regulation requires the submission of two routine annual reports and one special compliance report. The table below identifies these reports, their frequency and submission deadline.

PCV Program Report Submission Summary

Report	Frequency	Submission Deadline
Total Vehicle Delivery Report	Annually	Within 60 calendar days of the end of a model year reported.
NMOG Fleet Average Compliance Report	Annually	By March 1 st of the calendar year following the close of the reported model year.
Model Year 2008-2010 NMOG Compliance Report	Once	By March 1 st of the calendar year following the close of model year 2010

The annual NMOG Fleet Average Compliance Report for model years 2008, 2009 and 2010 must be submitted to the Department annually, but does not require demonstration of compliance with the Pennsylvania specific NMOG fleet average for the model year for which the compliance report was submitted. The model year 2008, 2009 and 2010 reports must show the actual calculated NMOG fleet average regardless if the calculated average is compliant with the NMOG fleet average standard.

Q. What is the required format for each of the reports?

A. The table shows the content required for each of the reports.

Table 2: PCV Program Report Content Summary

Report	Content
Total Vehicle Delivery Report	<ul style="list-style-type: none"> • Company Name, • Company Contact and Contact Information • Model year for which the report is being submitted, • Engine test group identifier • Number of vehicles delivered in each test group
NMOG Fleet Average Report	<ul style="list-style-type: none"> • Company Name, • Company Contact and Contact Information • Model year for which the report is being submitted, • Specific vehicle models comprising the sales in Pennsylvania, • Number of vehicles (including offset vehicles) sold for each model delivered for sale in PA, • Engine test group identifier for each model, • Vehicle class (PC, LDT1 or LDT2) for each model and their associated certification standards, • Percentage distribution of vehicles sold in PA by vehicle model, • Calculated NMOG fleet averages for Passenger Cars (PC/LDT1) and Light-duty trucks (LDT2). • NMOG credit/debit for reported model year. • Credit balance for carry-over credit including credits from previous eligible model years, if applicable. • Application of carry-over credits for reported model year, if applicable • Credit trading transactions include name of manufacturer to which and from which credits were transferred / acquired, which model year they were generated and to which model year they will be applied.
Model Year 2008-2010 NMOG Compliance Report	<ul style="list-style-type: none"> • Same information as NMOG Fleet Average Report but encompassing only model years 2008, 2009 and 2010. • Detailed information on when applied credits were generated and to what MY they are being applied.

Q. For model year 2008, 2009 and 2010 NMOG fleet average compliance, may automakers combine sales from all three model years and then calculate the average?

A. No. Automakers must demonstrate NMOG fleet average compliance with each individual fleet offered for sale in Pennsylvania for any given model year. Automakers may apply credits generated from model years 2008, 2009 or 2010 for any of those three model years. A credit generated during model years 2008, 2009 or 2010 may only be applied once within that three-year period.

Q. May an automaker apply NMOG credits generated during model years 2008, 2009 and 2010 in model years subsequent to 2010?

A. Yes. But only if the NMOG credit is generated and applied consistent with California Air Resources Board (CARB) rules. For example, an NMOG credit generated in model year 2008, if not used in model years 2009 or 2010, may be applied towards model year 2011

NMOG fleet average compliance but only at 25% of its original value, consistent with CARB rules regarding offsetting NMOG debits.

Q. Does Pennsylvania require automakers to offer the additional extended warranties required for vehicles certified for California's Zero Emissions Vehicle (ZEV) sales requirement?

A. No. As the Commonwealth has specifically excluded the ZEV sales percentage requirement from the PCV program, automakers need not offer those extended warranties for those vehicles offered for sale in Pennsylvania. The Department encourages automakers to offer and honor those extended warranties voluntarily, as a service to their customers.

All warranty provisions contained in CARB's rules referenced in [§ 126.431](#) of the PCV program are required.