[GTR21]Comment on FCEV procedure (Japan)

EVE-87-08e - UN GTR 21 proposal for the power determination of FCEVs.pdf (China)

Proposal 2. Scope and application 2.1. This UN GTR applies to vehicles that meet all of the following criteria (a) through (c): (a) Are hybrid electric vehicles, are pure electric vehicles that have more than one propulsion energy converter, or are fuel cell vehicles;

- PEVs with only one propulsion energy converter are not included in GTR21 scope.
- FCVs with only one propulsion energy converter should not be within the scope of GTR21, as is the case of PEVs.
- ➤ Otherwise, manufacturers have to conduct output tests for both Rated Power and System Power on FCVs with only one propulsion energy converter. We are concerned that this will cause inconsistent situation as a legal system.

In order to make the scope of FCVs consistent with PEVs, we would like to request that the same description as for PEVs be added for FCVs.