



February 12, 2024

Sharon Yukevich, Chief
Vehicle Defects Division – National Highway
Traffic Safety Administration
1200 New Jersey Ave., SE
Washington, DC 20590

VIA EMAIL

G243269
NEF-101sah
PE22-023

Subject: General Motors LLC's Supplemental Response to NHTSA's Dec 12, 2023 Information Request in Investigation PE23-022

Dear Ms. Yukevich:

This letter contains General Motors LLC's ("GM") supplemental response (the "**Response**") to Request 10 in your December 12, 2023, letter (the "**Request**") relating to National Highway Traffic Safety Administration ("NHTSA") Preliminary Evaluation PE22-023, which is a NHTSA investigation of alleged "malfunction[s] of the battery energy control module (BECM)" in MY2016-2019 Chevrolet Volt vehicles (as defined in the Requests, the "**Subject Vehicles**") that can "result in a loss of motive power."

GM prepared its Response by: (i) identifying, in consultation with the appropriate GM business personnel, the primary electronic databases and document repositories in GM's custody and control that store potentially responsive documents and information in the ordinary course of business, as more fully identified in the Responses below; and (ii) conducting a reasonable search, as appropriate, of these databases and document repositories for responsive documents and information. GM objects to the definitions of "document" and "GM" in the Requests as overbroad, unreasonably burdensome, and not reasonably tailored to records that might be expected to bear relevant and responsive information. GM's document production does not contain: (i) attorney-client privileged information or information protected as attorney-work product; and (ii) documents generated or archived in these locations after the dates that GM conducted its final searches. GM construes the Information Request as pertaining to vehicles manufactured for sale in the United States and its territories.

GM's document production is contained in the folder titled G243269_1_GM. Certain portions of these documents are exempt from public disclosure under the Freedom of Information Act (5 U.S.C. § 552(b)(4)) ("**FOIA**") and 49 CFR part 512, and have been redacted in the copy contained in the folder. GM has submitted the unredacted nonpublic copy of its document production (in the folder titled G243269_2_GM_CONF) to the NHTSA Office of Chief Counsel under 49 C.F.R. part 512.

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Some of the documents in GM's production contain personally identifiable information ("PII") (e.g., vehicle registration information or VIN, employee names, and customer/employee contact information). GM today submits documents with unredacted PII with the understanding that NHTSA (or GM, if NHTSA prefers) will redact any PII before disclosing these documents to the public.

REQUESTS AND RESPONSES

REQUEST 10

Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, GM. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action;
and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

GM RESPONSE:

GM identified responsive production investigations by conducting a reasonable search in GM's Global Vehicle Safety-Case Observation Review and Evaluation ("GVS-CORE") database, which is the primary electronic records database for GM's Safety and Field Investigations organization.

GM is producing additional nonprivileged documents that are responsive to Request 10 in the G243269_1_GM and G243269_2_GM_CONF folders in the subfolders labeled "Q_10". The index file PE23-022 Q10 Index provided is a directory of the files with the original file names and is labeled as listed in PE23-022 Related Investigations.

CONCLUSION

While GM will continue to monitor the performance of the Subject Component in the Subject Vehicles in the field, GM concludes, based on current data, that the Subject Component in the Subject Vehicles do not pose an unreasonable risk to motor vehicle safety. GM's Responses are based upon its investigation to date and reflect its current information and assessment. GM reserves the right to supplement or amend its Responses as appropriate.

Please contact me if you require further information about this response or the nature or scope of our searches.

Sincerely,

A solid black rectangular redaction box covering the signature of Sabrina Groshek.

Sabrina Groshek, Executive Director
Global Systems and Product Investigations

cc: Ms. Sharon Yukevich
Sean Hays
ODI_IRresponse@dot.gov

Enclosures

G243269_1_GM – Public copy of GM's document production

G243269_2_GM_CONF