

August 17, 2020

The Honorable Patricia Monahan  
California Energy Commission  
1516 Ninth Street Sacramento, CA 95814

**Docket No. 20-IEPR-02**

**RE: Integrated Energy Policy Report Commissioner Workshop on Near-Zero Emission Vehicles**

Dear Commissioner Monahan:

The Strong Plug-in Hybrid vehicle Coalition appreciates the opportunity to comment on the Near-Zero Emissions Workshop as well as the CEC's overall objective to "Lead The State to a 100% Clean Energy Future".

Established in July 2019, the Strong PHEV Coalition represents an independent group of over 20 electric transportation experts with more than 300 years of collective professional experience. We possess expertise in most disciplines of the EV industry including research and academia, vehicle manufacturing and deployment, policymaking, utilities, NGO advocacy, consumer education, EV fleet management, and charging infrastructure development.

With the specific goal to support California's and the United States' efforts to reduce GHG emissions, the Coalition educates regarding more electrified variants of PHEVs (i.e., mid-range or long-range PHEVs) that drive most of their miles powered by clean electricity. Additionally, the Coalition advocates for policies that include consideration for the strongest PHEVs.

SPHEVs have a variety of attractive attributes, particularly the ability to help grow the market faster than either Battery Electric or Near-Zero Emission Vehicles alone—and, likely, even both of them together. Any of the low carbon fuels in the CEC's purview can, and should, be used as secondary fuels in SPHEVs. Doing so makes renewable fuels in limited supply go much further, and distributes their benefit over a greater number of vehicles. Additionally, this fuel flexibility mitigates the challenge of limited distribution and public infrastructure for "newer" fuels and enhances the contribution of SPHEVs to municipal and regional resilience needs. These advantages are particularly important for rural and disadvantaged community members.

SPHEVs can also support congestion charge schemes, "emissions-free zones", or other local vehicular propulsion policy, either preserving electric range to be used in those zones through a manually-enabled "hold mode" featured on many of today's models,

or automatically-geofenced transition systems currently in development. This allows low-carbon fuels that may be excluded by such policies to still be used in those vehicles under other circumstances.

That SPHEVs share such political and technological common ground with every other fuel discussed in the NZEV workshop encourages their inclusion in the Commission's NZEV consideration. We look forward to future discussions with CEC Commissioners and Staff about the promise of Strong Plug-in Hybrids as an integral part of the future.

Sincerely,

Robert Graham

Chelsea Sexton

Co-Chairs, Strong Plug-In Hybrid Vehicle Coalition