

July 24, 2025

California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Submitted at the Advanced Clean Trucks Board [hearing comment docket](#)

Re: June 2024 workshop on Advanced Clean Truck Regulations

Dear Chair Randolph, members of the Board and Staff:

The Strong Plug-in Hybrid Electric Vehicle (PHEV) Coalition's advocacy team appreciates this opportunity to comment on the proposed Advanced Clean Trucks regulation. Established in July 2019, the Strong PHEV Coalition represents an independent group of over 40 electric transportation experts with many years of collective professional experience. We possess expertise throughout the EV industry including research and academia, vehicle manufacturing and deployment, policymaking, utilities, NGO advocacy, consumer education, EV fleet management, and charging infrastructure development.

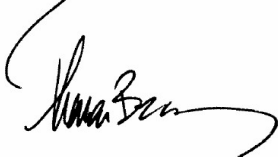
The Coalition has provided information to CARB during the last 5 years as we have supported PHEV (aka NZEV) provisions on a sliding credit scale in the original ACT regulation and light duty PHEVs with a minimum of 50 miles or greater all-electric range (AER) based on USEPA's label in the ACC II regulation. Please see www.sphev.org for our previous education and advocacy efforts including letters to CARB staff and our April 2023 [overview](#) of strong PHEVs.

We support the proposed changes to ACT Section 1963.2(b)(2) on Minimum All-Electric Range for NZEVs. We agree with the need for more flexibility for manufacturers and the rationale provided by staff in the initial statement of reasons. We strongly believe that the proposed 45 miles minimum all-electric range (compared to the current 75 mile minimum) is attainable for these vehicles while still enabling a significant number of all-electric miles driven and meaningful emissions reductions because the credit for NZEVs is proportional to the all-electric range. The PHEV truck market has not developed as expected and this ACT change should help encourage manufacturers to produce them.

However, rather than starting this change in Model Year 2030 as staff proposes, we respectfully request this be moved up by two or three years.

We seek to be a resource to CARB to connect policy making to the resources and expertise that we have available in our diverse team. We look forward to more dialogue with staff so that we might collectively improve the sustainability, justice, and economy of transportation for all stakeholders.

Sincerely,



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