July 17, 2026

Chair Sanchez and Members of the Board
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95812

Submitted via electronically to cleancars@arb.ca.gov

RE: Plug In America's comments on CARB's Proposed Drive Forward Light-Duty Vehicle Program June Workshop

Dear Chair Sanchez, Members of the Board, and CARB Staff,

Plug In America is grateful for the opportunity to comment on the Drive Forward Light-duty Vehicle Program's June 2026 Workshop. Plug In America is a nonprofit organization committed to advancing transportation electrification through research, policy design, advocacy, and public education. We represent electric vehicle (EV) drivers across the U.S., including a robust network in California, and we are eager to continue contributing to policy development that advocates for drivers and policymakers alike.

We strongly support CARB's intention to design a next-generation program that builds on past regulatory successes, accounts for changes promulgated under the current EPA framework, and continues to drive California's leadership in zero-emission vehicle (ZEV) adoption. This letter builds on our previous comment following the October 2025 Drive Forward workshop[1].

Greenhouse Gas Standards

Plug In America supports CARB in setting aggressive fleet-average light-duty vehicle standards. Doing so advances Drive Forward's ultimate goal of improving California's air quality and reducing harmful transportation-related tailpipe pollution and greenhouse gas (GHG) emissions. We suggest that fleet-average GHG standards be consistent with California's 2045 Climate Goal in order to maximize the regulations' complementarity, and we simultaneously recognize the importance of flexibility in meeting these standards. As such, we support allowing credit banking, pooling, and trading, especially with Section 177 states.

ZEV Minimum Standards

Establishing strong minimum standards sends a clear signal in favor of full transportation electrification. Plug In America supports CARB's proposal to include ZEVs in the fleet average calculation, and suggests that CARB determine the starting minimum percentage based on

[1]https://ww2.arb.ca.gov/form/public-comments/submissions/54926

today's market share. Basing the ZEV level phase-in length and appropriate increases on historic trends and growth projections that meet established California air quality and climate goals can ensure that the standards rise in accordance with the state's progress.

Plug In America also encourages CARB to include long-range plug-in hybrid electric vehicles (PHEVs)/extended range EVs (EREVs) in its ZEV minimum standards allowance. We suggest that compliant PHEVs should meet several criteria: the capacity for at least 80 miles of all-electric range (AER); capability for bidirectional and DC Fast Current charging; and integrated technology to remind users to plug in their vehicle at regular intervals.

Including long-range PHEVs meets CARB's goal of supporting advanced technology deployment and development, expands consumer choice and exposure to EV technologies, and creates additional flexibility to advance electrification amid fluctuating market conditions and policy decisions. By allowing long-range PHEVs in the final compliance band (e.g., eligible to close the final 20 percent gap to full electrification), CARB has the opportunity to propel EV technology forward for the benefit of consumers.

Long-range PHEV vehicle technology is proven and expanding rapidly. Manufacturers have announced at least sixteen new EREV models slated for the U.S. market in the next three years[2]. The inclusion of these new vehicles builds on a strong record of long-range PHEV production for international markets: research by the Strong PHEV Coalition has identified nearly 200 medium- (40-80 miles AER) and long-range (80+ miles AER) PHEV models available in European and Asian markets—including options from manufacturers such as Ford, Nissan, Volvo, and VW[3]. The existing medium PHEV range is nearly double the average driver's daily mileage, estimated at approximately 33 miles by the Federal Highway Administration,[4] and is therefore sufficient to meet most drivers' daily driving needs without triggering gas utilization.

Long-range PHEVs can present an attractive option for cost-conscious consumers, hesitant EV adopters, and those who need their vehicle for heavier-duty uses like towing, delivery, extended-distance driving, or commercial operations. Many long-range PHEV models available internationally cost less than $45,000[5]—below the $49,000 average U.S. new vehicle transaction cost in 2026[6]. Likewise, heavy-duty use cases are particularly challenging to fully electrify: EVs account for 1.5 percent of Class 2b and 0.2 percent of Class 3 vehicles in California, far below the 6.9 percent for all passenger vehicles in the state[7]. These vehicles are also responsible for a disproportionate share of California's vehicle emissions, making them strong candidates for PHEV and EREV technologies. Diversifying compliant vehicle options can reduce vehicle emissions without undermining innovation, while advancing full electrification, and can better serve the needs of drivers who already face a more limited range of EV solutions. By including

[2] https://topelectricsuv.com/hybrid-trucks/range-extender-models-upcoming/
[3]https://sphev.org/2026/03/07/letter-carb-dec-5-wordshop-on-drive-forward-medium-and-heavy-duty-vehicle-regulation/
[4] https://www.kbb.com/car-advice/average-miles-driven-per-year/
[5] https://sphev.org/2026/03/07/letter-carb-dec-5-wordshop-on-drive-forward-medium-and-heavy-duty-vehicle-regulation/
[6] https://www.kbb.com/car-news/average-new-car-price-cooled-slightly-to-49220-in-may/
[7] https://escholarship.org/content/qt28g0s1r9/qt28g0s1r9.pdf?v=lg

long-range PHEVs in the list of compliant vehicles, CARB has the opportunity to expand the suite of electrified options available to U.S. consumers, encourage OEMs to evolve their products, and target emissions reductions in hard-to-reach transportation segments.

In addition to the range requirements, Plug In America advocates for ZEV minimum-standard-compliant PHEVs to be equipped with bidirectional and DCFC charging capability, as well as technologies that remind drivers to plug in their vehicles. Automakers are increasingly equipping their PHEV and BEV models with bidirectional capabilities, demonstrating the technology's feasibility[8]. Bidirectional charging can reduce grid strain, minimize peak demand, and promote energy resilience when it acts as a backup battery. Likewise, while PHEVs are less dependent on DCFC charging than EVs, the ability to charge quickly and conveniently is strongly correlated with high levels of driver satisfaction and can increase the likelihood of future adoption of all-electric vehicles. Plug In America is agnostic about how manufacturers should remind PHEV drivers to plug in, so long as the reminder function is clearly integrated into the user interface. Adding this feature can maximize emissions reductions and encourage drivers to rely on electricity for power rather than gas.

ZEV0 Bin Requirements—Battery Durability & Warranty

To account for complete battery usage, Plug In America recommends that CARB introduce a "virtual mile" calculation that includes all forms of battery usage (stationary and mobile) in order to present an accurate estimate of the battery's health for consumers and recyclers alike. CARB's current durability and warranty requirements evaluate EV batteries' state of health based on the vehicle's age and odometer reading. By choosing a distance-based metric, the framework overlooks the impact of bidirectional charging, which, though stationary, is proven to degrade the battery at a similar rate to driving the vehicle[9].

Additional details, justification, and data are submitted in a joint comment from the Alliance for Automotive Innovation, Vehicle Grid Integration Council, CalETC, and Plug In America.

ZEV0 Bin Requirements—Convenience Cord

Finally, Plug In America suggests replacing the universal convenience cord requirement with an option for OEMs to provide EV buyers with a non-expiring voucher redeemable for a convenience cord at the vehicle point of sale. Introducing a voucher preserves CARB's goal of increasing charging access while allowing customers to choose whether they need the cable, reducing manufacturer costs, minimizing waste, and introducing flexibility for technological progress.

Many consumers may not immediately need a convenience cord. Drivers with preexisting home charging, those who choose to buy charging cords that better suit their needs (e.g. longer cables, enhanced durability, or smart charging-capable cords), or fleet operators who do not rely

[8] https://www.evconnect.com/blog/what-is-bidirectional-charging-understanding-the-benefits-for-both-drivers-and-businesses/
[9] https://www.mdpi.com/2313-0105/12/1/22.

on individual vehicle charging may not find the convenience cord necessary. Mandating a convenience cord will drive manufacturers to include the cord's cost in the vehicle purchase price, raising costs by $150-300 per vehicle. This additional cost may place an unnecessary burden on cost-sensitive households. As an added benefit, including the voucher in EV resale could allow used EV purchasers to access the appropriate convenience cord for their needs: convenience cords delivered to consumers today may become obsolete as manufacturers increasingly switch from CCS to NACS charging ports[10].

Plug In America commends CARB for its leadership and its openness to stakeholder feedback. We look forward to continued engagement in developing the Drive Forward Initiative and ensuring California's continued progress in accelerating ZEV adoption. Please do not hesitate to contact me at solenicheva@pluginamerica.org with any questions.

Sincerely,



Sofya Olenicheva
Senior Policy Manager, Plug In America

[10] https://www.motortrend.com/news/tesla-nacs-charging-port-automaker-compatibility