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California Energy Commission
Docket Office
Attn: Docket 06-AFP-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

In re. Docket No. 06-AFP-1

Alternative Transportation Fuels Plan Full Cycle Analysis Workshop

The undersigned Miles Automotive Group Ltd submits its written comments in the above captioned proceeding.

The California legislature has determined that clean alternative fuels, including electricity, are important to State strategies to attain California's air and water quality goals.

In seeking to determine the optimum environmental and public health benefits of alternative fuels, we believe that not enough attention has been paid to the use of electricity via batteries to power 100% electric vehicles.

100% electric vehicles (as opposed to vehicles powered by other means, including hybrid vehicles) provide the following benefits:

- The infrastructure is in place throughout the State for the delivery of electrical power through the existing grid and residential and commercial electrical outlets - - no additional infrastructure is required.
- All emissions, including air pollutants, toxics, greenhouse gases, water pollutants, and other substances known to directly or indirectly damage human health are eliminated.
- There is no use of petroleum products or petroleum consumption.
- There is no net material increase in air pollution, water pollution, or other substances that are known to damage human health.
- Minimizes economic cost to the State through reduced operating costs for State vehicles.

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- Does not require alternative fuel stations since 100% electric vehicles can and are being manufactured with on board chargers which operate totally satisfactorily from standard electrical outlets

In considering “full fuel-cycle assessment” important consideration should be given to the fact that a multitude of opportunities exist for the generation of electricity on a clean basis. This includes generation of electricity through water, wind, and thermal power, tide driven water turbines, nuclear power, solar power, and clean coal generation.

Although every assessment of availability of electricity indicates that the state of California has sufficient electricity generation for the servicing of a large number of electrical vehicles, the Plan should include consideration of future incentives for the use of clean coal processes and other clean sources including solar to generate electricity. Additionally, adequate financial incentives should be considered during the next few years to encourage consumers to adopt 100% electric powered vehicles and to encourage further research, development, demonstration and commercialization of advanced electric batteries and electric powertrains.

The State itself should mandate the use of 100% electric vehicles as an important part of its fleet.

Respectfully submitted for Miles Automotive Group Ltd by R. David Hirsch, Chief Executive Officer