



NISSAN NORTH AMERICA, INC.  
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Franklin, TN 37067

**DOCKET**

**11-IEP-1L**

DATE SEP 21 2011

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September 21, 2011

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 11-IEP-1L  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Via email docket@energy.state.ca.us

**RE: Nissan North America, Inc. comments to the California Energy Commission Draft Transportation Energy Forecasts and Analyses for the 2011 Integrated Energy Policy Report**

Dear Docket:

Please consider the following comments from Nissan North America, Inc. regarding the Draft Transportation Energy Forecasts for the 2011 IEPR.

In response to the "Light-Duty Vehicle Forecast" on page 72-73 of the report, Nissan disagrees with your statement that "full electric vehicles...never gain appreciable market share." Figures 3-6 and 3-7 estimate no growth of battery electric vehicles by 2030, while plug-in hybrids exceed more than 20,000,000 units in the high and low scenarios.

Nissan is committed to zero-emission vehicle technology, and has brought this technology to market today with the 100% electric Nissan LEAF. Nissan has delivered thousands of battery electric (BEV) vehicles to California in 2011, with a strong commitment to continue manufacturing and delivering vehicles that help reduce our demand for petroleum. Our CEO, Carlos Ghosn, stated a goal of 10% of all new vehicle sales to be electric by the year 2020, and Nissan has invested in this goal with a US-based factory that will produce up to 150,000 EVs annually.

Many government and industry reports have independently analyzed the electric vehicle market, and although there are varying estimates for demand as shown by this summary from the California PEV Collaborative, they are all more than zero.

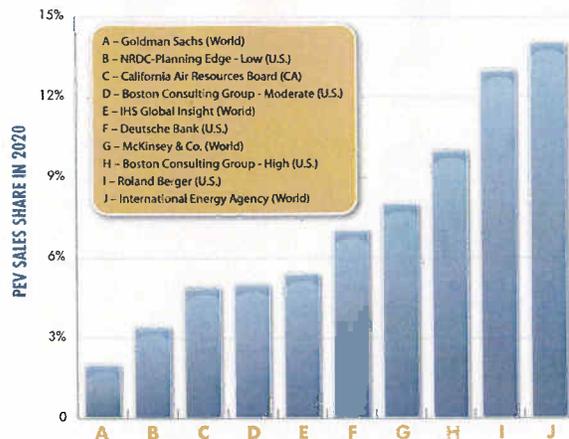


Figure 1. An example of PEV market projections for 2020

CA PEV Collaborative Summary of industry reports on PEV demand from "Taking Charge: Establishing Leadership in the Plug-In Electric Vehicle Marketplace," Figure 1 (page 12).

A very pessimistic study on EV adoption from JD Powers "Drive Green: More Hope than Reality," pegs EV adoption in the US at 1.8% of new car sales by 2020, which is still greater than the CEC estimates. The May 2009 McKinsey and Company "Roads toward a low-carbon future: Reducing CO2 emissions from passenger vehicles in the global road transportation system," provides an aggressive adoption scenario that puts EVs at 8% of global market share by 2020. A more recent study that uses Southern California specific data from the UCLA Luskin Center, "Realizing the Potential of the Los Angeles Electric Vehicle Market," even puts the adoption rate of BEVs slightly greater than PHEV (*Table 7.6 Projected Green Car Market Share by Los Angeles Zip Code*, Appendix p. 108).

In addition, early sales numbers for the first EVs and PHEVs suggest that demand is in fact stronger for a full battery electric. As of August 2011, the Nissan LEAF EV leads the Chevy Volt PHEV nearly 2-1 with 6,168 to 3,172 units sold respectively.

Nissan encourages CEC to re-evaluate the estimated light-duty vehicle forecast for battery electric vehicles. We appreciate the opportunity to comment and welcome questions or further discussion.

Sincerely,

*Tracy Woodard*

Tracy Woodard  
 Director, Government Affairs  
 Nissan North America, Inc.