

November 4, 2022

The Honorable Janet Yellen
Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

RE: Notice 2022-56 Request for Comments on Section 45W Credit for Qualified Commercial Clean Vehicles and Section 30C Alternative Fuel Vehicle Refueling Property Credit

Dear Secretary Yellen:

On behalf of the National Association of State Energy Officials (NASEO), we appreciate the U.S. Department of Treasury's rapid action on a number of important energy-related tax provisions included in the Inflation Reduction Act (IRA). NASEO represents the nation's 56 governor-designated State, Territory, and District of Columbia Energy Offices focused on advancing clean, affordable, reliable energy solutions in energy production, distribution, and end-use. Following are NASEO's comments on questions raised by the U.S. Treasury in Notice 2022-56 – Section 45W Credit for Qualified Commercial Clean Vehicles.

Section 45W – NASEO Comments – NASEO is supportive of the commercial vehicle tax credit, and its potential to dramatically accelerate both light-duty and medium- and heavy-duty zero-emission vehicle adoption by both private fleets and public fleets. However, we are concerned about how the IRA language may limit the applied credit to no more than the incremental costs of a zero-emission vehicle over an internal combustion vehicle. This requirement could create uncertainty and a burdensome process. We encourage the U.S. Treasury to develop a simple, streamlined methodology, with generic internal combustion vehicle base costs by vehicle size, so that users of the tax credit can easily understand whether they are eligible for the full credit, and we encourage maximum flexibility on making users eligible for the full credit.

We hope that the U.S. Treasury is able to address the above issue in favor of maximizing the benefits of clean, domestic energy for all Americans.

Best regards,



David Terry, NASEO Executive Director

cc: State Energy Directors

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