

U.S. DEPARTMENT OF
ENERGY

Office of
**ENERGY EFFICIENCY &
RENEWABLE ENERGY**



Example Alternative Compliance Annual Report

EPAct State and Alternative Fuel Provider Fleet
Program User Guide

November 2024

Background

The U.S. Department of Energy (DOE) developed an electronic reporting spreadsheet to facilitate covered fleets' preparation of a complete Alternative Compliance (AC) annual report. All fleets that participate in AC are encouraged to use the spreadsheet. The following examples include one AC annual report that uses the spreadsheet and one AC annual report that does not use the spreadsheet. Both examples include all components that must be included in a fleet's AC annual report. For further information on how to use the planning spreadsheet and AC waiver applications, visit the State and Alternative Fuel Provider Fleet Program Alternative Compliance webpage: <https://epact.energy.gov/alternative-compliance>.

Example 1: AC Annual Report Using the Reporting Spreadsheet

December 15, 2027

Regulatory Manager
Alternative Fuel Transportation Program
Vehicle Technologies Office (EE-3V)
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

RE: MY 2027 Alternative Compliance Annual Report

Dear Regulatory Manager:

In accordance with 10 C.F.R. section 490.807, Power On, Inc. (POI; EPA Fleet ID No. 999000) submits this letter and the accompanying report [Alternative Compliance reporting spreadsheet] certifying the amount of petroleum fuel use that it reduced during the 2027 waiver year (i.e., model year [MY] 2027) through Alternative Compliance.

Based on the Alternative Compliance waiver that the U.S. Department of Energy (DOE) granted to POI for MY 2027, the fleet's petroleum fuel use reduction requirement for MY 2027 was 47,400 gasoline gallon equivalents (GGE). The Petroleum Reduction Plan contained in POI's waiver application specified the use of two strategies to achieve an estimated reduction of 58,087 GGE.

The table below summarizes POI's planned petroleum fuel use reductions and the actual petroleum fuel use reductions that POI achieved, which are documented in the attached report [reporting spreadsheet].

Strategy (fuel)	Planned Petroleum Fuel Use Reductions (in GGE)	Actual Petroleum Fuel Use Reductions (in GGE)
Alternative Fuel (CNG)	14,162	18,223
Biodiesel Blend (B100)	43,925	80,539
Total	58,087	98,762

Given the 98,762 GGE savings the fleet actually achieved and the 47,400 GGE savings the fleet was required to achieve, the fleet managed to achieve an excess petroleum fuel use reduction of 40,675 GGE (i.e., 98,762–58,087) during MY 2027. POI’s actual MY 2027 petroleum reduction amounted to 208 percent of its petroleum fuel use reduction requirement.

Pursuant to 10 C.F.R. section 490.804(c), POI hereby requests that DOE roll over the excess petroleum fuel use reductions that POI achieved in MY 2027 (i.e., 40,675 GGE) for potential use by our fleet in future model years in which POI participates in Alternative Compliance. POI understands that there are restrictions on the use of these roll-over GGEs, and that the restrictions are explained in DOE’s *Alternative Compliance Guidance* document (https://epact.energy.gov/pdfs/alt_compliance_guide.pdf).

Pursuant to 10 C.F.R. section 490.807(a)(1)(i), POI further certifies that its covered (i.e., non-excluded) light-duty vehicles used a total of 127,787 GGE (i.e., petroleum gallons plus alternative fuel GGE) during MY 2027.

Included in the attachments are the following:

- A completed reporting spreadsheet detailing the results obtained through each of the two strategies that POI employed; and
- A copy of the Petroleum Reduction Plan that POI submitted on July 15, 2026, as part of its Alternative Compliance waiver application.

Sincerely,

Al Ternafule

Director, Fleet Services

Power On, Inc.

999-777-1111

Al.Ternafule@Poweron.com

Note: Fleets should attach a copy of their reporting spreadsheet and Petroleum Reduction Plan (spreadsheet) to their annual report submission. The screenshots below are for example purposes only. Further, the following report/plan and values in the report/plan are provided ONLY as an example and likely do not resemble typical fleet use figures. The information below may not match the information in the preceding portion of this example report.

Attachment: Reporting Spreadsheet

Alternative Compliance Reporting Spreadsheet

KEY	
	Enter data in cells with this color shading
	Select a value from the dropdown list
	Required field
	Calculated values. Do not enter data in cells shaded in this color
	Error or unchecked required checkbox
	Information about working with the tables in this workbook.

The U.S. Office of Management and Budget (OMB) approved this data collection under control number 1910-5101. You are not required to respond to this collection of information unless it displays a currently valid OMB control number. Reporting takes about five hours per session. For help with reporting, access guidance documents at http://www.eere.energy.gov/vehiclesandfuels/epact/guidance_documents.html. OMB #: 1910-5101 Expires: 10/31/2021

Fleet Identification (* required field)

Fleet ID Number: 1255
 *Fleet Name: Sample
 Local name:
 Parent Organization:
 *Fleet Type: P
 *Mailing Address:
 a street
 a city
 *City:
 *State:
 *Zip (#####-####): 80401

(Parent Organization is parent company name, if applicable, for alternative fuel provider fleet or state name for state fleet)

Point of Contact Information

POC ID Number:
 *Name:
 Mailing Address (if different from fleet mailing address)
 City:
 State:
 Zip (#####-####):
 *Phone:
 Fax:
 *E-Mail:

POC Nsmr

555 555 5555

email@address

Reporting Model Year: 2021 ##### to 8/31/2021

<input checked="" type="checkbox"/>	Model Year 2021 Alternative Compliance Waiver Request is
<input checked="" type="checkbox"/>	The cover letter is signed by a senior official
<input checked="" type="checkbox"/>	Supporting documentation is attached

Enter your 2021 petroleum reduction requirement below

22,300 Petroleum Reduction Requirement (GGE)

Enter the planned GGE reduction from your approved AC Waiver Request for each petroleum reduction method below. Values for your actual GGE reduction will be filled in automatically based on your input on the appropriate worksheet within this Excel Workbook for each petroleum reduction method. Click on the hyperlink to the right of each category to review or edit your input on the individual worksheets within this Excel file.

Petroleum Reduction Method	Planned GGE Reduction	Actual GGE Reduction
Replace conventional vehicles (Fuel Economy Improvement sections of the Petroleum Reduction Plan)	4,500	5,144
Use alternative fuels in existing or new vehicles	7,200	11,333
Use of biodiesel blends	12,000	12,515
Reduce Vehicle Miles Traveled	1,000	1,363
Reduce Idling	-	-
Total	24,700	30,355

Excess (GGE) **8,055**

[Review/Edit Improve Fuel Efficiency sheet](#)
[Review/Edit Use Alternative Fuels sheet](#)
[Review/Edit Biodiesel Blends sheet](#)
[Review/Edit VMT Reduction sheet](#)
[Review/Edit Idle Time Reduction sheet](#)

Based on the 30355 GGE savings the fleet achieved and the 22300 savings the fleet was required to achieve, the fleet realized an excess petroleum use reduction of 8055 GGE during MY 2021, exceeding the requirement by 36 percent.

<input checked="" type="checkbox"/>	Pursuant to 10 C.F.R. Section 490.804 (c), Fleet Sample hereby requests that DOE roll over the excess petroleum use reduction amount of 8055 GGE for potential use in future MYs in which fleet Sample participates in Alternative Compliance but fails to achieve its required petroleum-use reduction
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Attachment: Petroleum Reduction Plan

KEY	
	Enter data in cells with this color shading
	Select a value from the dropdown list
	Calculated values. Do not enter data in cells shaded in this color
	Error or unchecked required checkbox
	Information about working with the tables in this workbook

Fleet Identification (* required field)

Fleet ID Number:	1255
*Fleet Name:	Sample
Local name:	
Parent Organization:	
*Fleet Type (select from list):	P
*Mailing Address:	a street
*City:	a city
*State:	CO
*Zip (xxxx-xxxx):	80401

Point of Contact Information

POC ID Number:	
*Name:	
Mailing Address (if different from fleet mailing address):	
City:	
State:	
Zip (xxxx-xxxx):	
*Phone:	
Fax:	
*E-Mail:	

POC Name
303 555-5555
a.POC@real.gov

(Parent Organization is parent company name, if applicable, for alternative fuel provider fleet or state name for state fleet)

Enter the Reporting Model Year 9/1/17 to 8/31/18

Enter you ACV Inventory Total LDVs ACV Inventory

Enter the average fuel use per light-duty vehicle (LDV) in your fleet GGE/LDV Avg Fuel Use Calculation Changing

MY 2018 Petroleum Reduction Requirement GGE

Click the button for each petroleum reduction method below to calculate the planned GGE reduction for your AC Waiver Request. The button for each category will take you to individual worksheets within this Excel file. Click on the "Planning Summary" button to return to this sheet.

Alternative Fuels

PHEVs

Biodiesel Blends

Fuel Economy

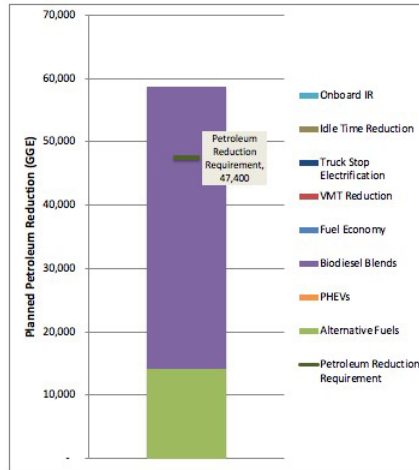
VMT Reduction

Truck Stop Electrification

Idle Time Reduction

Onboard IR

Method	Planned Petroleum Reduction
Alternative Fuels	14,162
PHEVs	-
Biodiesel Blends	44,594
Fuel Economy	-
VMT Reduction	-
Truck Stop Electrification	-
Idle Time Reduction	-
Onboard IR	-



Example 2: AC Annual Report Without the Reporting Spreadsheet

December 15, 2027

Regulatory Manager
 Alternative Fuel Transportation Program
 Vehicle Technologies Office (EE-3V)
 U.S. Department of Energy
 1000 Independence Avenue, S.W.
 Washington, D.C. 20585-0121

RE: MY 2027 Alternative Compliance Annual Report

Dear Regulatory Manager:

In accordance with 10 C.F.R. section 490.807, Power On, Inc. (POI; EPA Fleet ID No. 999000) submits this letter and the accompanying report certifying the amount of petroleum fuel use that it reduced during the 2027 waiver year (i.e., model year [MY] 2027) through Alternative Compliance.

Based on the Alternative Compliance waiver that the U.S. Department of Energy (DOE) granted to POI for MY 2027, the fleet’s petroleum fuel use reduction requirement for MY 2027 was 47,400 gasoline gallon equivalents (GGE). The Petroleum Reduction Plan contained in POI’s waiver application specified the use of two strategies to achieve an estimated reduction of 58,087 GGE.

The table below summarizes POI’s planned petroleum fuel use reductions and the actual petroleum fuel use reductions that POI achieved, which are documented in the attached report.

Strategy (fuel)	Planned Petroleum Fuel Use Reductions (in GGE)	Actual Petroleum Fuel Use Reductions (in GGE)
Alternative Fuel (CNG)	14,162	18,223
Biodiesel Blend (B100)	43,925	80,539
Total	58,087	98,762

Given the 98,762 GGE savings the fleet actually achieved and the 47,400 GGE savings the fleet was required to achieve, the fleet managed to achieve an excess petroleum fuel use reduction of 40,675 GGE (i.e., 98,762 – 58,087) during MY 2027. POI’s actual MY 2027 petroleum reduction amounted to 208 percent of its petroleum fuel use reduction requirement.

Pursuant to 10 C.F.R. section 490.804(c), POI hereby requests that DOE roll over the excess petroleum fuel use reductions that POI achieved in MY 2027 (i.e., 40,675 GGE) for potential use by our fleet in future model years in which POI participates in

Alternative Compliance. POI understands that there are restrictions on the use of these roll-over GGEs, and that the restrictions are explained in DOE's *Alternative Compliance Guidance* document (https://epact.energy.gov/pdfs/alt_compliance_guide.pdf).

Pursuant to 10 C.F.R. section 490.807(a)(1)(i), POI further certifies that its covered (i.e., non-excluded) light-duty vehicles used a total of 127,787 GGE (i.e., petroleum gallons plus alternative fuel GGE) during MY 2027.

Included in the attached report are the following:

- Details of the results obtained through each of the two strategies that POI employed;
- Discussion of the data used to calculate the strategy-specific petroleum fuel use reductions along with substantiating documentation; and
- A copy of the Petroleum Reduction Plan that POI submitted on July 15, 2026, as part of its Alternative Compliance waiver application.

Sincerely,

Al Ternafule

Director, Fleet Services Power On, Inc.

999-777-1111

Al.Ternafule@Poweron.com

Attachment: Alternative Compliance – Model Year (MY) 2027 Petroleum Fuel Use Reduction Results

For MY 2027, Power On, Inc. (POI) employed two strategies to reduce the total amount of petroleum fuel used by the fleet. The first strategy was the continued use of compressed natural gas (CNG) as a motor fuel for natural gas vehicles (NGVs) in our fleet. The second strategy was the use of B20 (i.e., a biodiesel blend composed of 80% petroleum diesel and 20% neat biodiesel) in our diesel-powered medium- and heavy-duty motor vehicles.

POI's petroleum fuel use reduction requirement was 47,400 GGE.

Strategy 1: Use of Alternative Fuel (CNG)

During MY 2027 (i.e., Sept. 1, 2026–Aug. 31, 2027), POI used in its utility operations 12 compact sedans and 28 large vans powered by CNG. The average annual vehicle miles traveled (VMT) for these vehicles is 8,914 miles for the large vans and 5,866 miles for the compact sedans, based on data derived from our fleet management information

system. In addition, the fuel economy of these bi-fuel vehicles when operating on gasoline is 21.6 mpg (large vans) and 27 mpg (compact sedans). Hence, the petroleum fuel use reduction target for each vehicle class was 11,555 GGE for the large vans and 2,607 GGE for the compact sedans, for a total planned petroleum reduction target of 14,162 GGE, as reflected in the Petroleum Reduction Plan contained in our waiver application.

As indicated by the attached pumping records, during MY 2027, the amount of CNG @ 3,000 pounds per square inch (psi) dispensed into these 40 NGVs from POI's CNG fueling stations totaled 101,240 gallons. Consistent with DOE's Alternative Compliance Annual Reporting guidance and the CNG gallons @ 3000 psi conversion factor¹ found in Appendix D of the *Alternative Compliance Guidance*, this yields the following calculation:

$$101,240 \text{ gallons of CNG @ 3000 psi} \times 0.18 \text{ GGE/gallon} = 18,223 \text{ GGE}$$

The total petroleum fuel use reduction achieved through the use of CNG as a motor fuel therefore exceeded the target amount by 4,061 GGE (i.e., 18,233–14,162). The greater-than-planned use of CNG was due to a delay in releasing several of the NGVs for sale/auction (i.e., greater-than-planned usage of the vehicles).

Strategy 2: Use of Biodiesel Blends

During MY 2027, POI planned to use B20 in its on-road diesel vehicles as an additional means by which to reduce the fleet's petroleum consumption. Our target was to reduce petroleum use by 43,925 GGE through the planned deployment of 209,165 gallons of B20, which equates to 41,833 gallons of neat biodiesel (B100) and, after application of the 1.05 conversion factor, 43,925 GGE. This biodiesel blend was to be used in our medium- and heavy-duty motor vehicle fleet, which consists of 9 motor vehicles weighing less than 14,000 pounds, 49 motor vehicles weighing between 14,000 and 26,000 pounds, and 206 motor vehicles weighing over 26,000 pounds. Based on data from our fleet management information system, these vehicles were expected to have average annual VMT figures of 32,659 miles, 23,777 miles, and 4,548 miles, respectively.

During MY 2027, and specifically from Sept. 1, 2026, through July 1, 2027, POI purchased 383,520 gallons of B20 from its biodiesel supplier (bills of lading and purchase invoices verifying these purchases are on file). All of this B20 fuel was pumped first into the 10 diesel fuel tanks within POI's fueling system, and thereafter into the 264 diesel-powered medium- and heavy-duty motor vehicles in the POI fleet; none of this B20 was used in diesel-powered generators or non-road vehicles. Pumping records for the 10 diesel fuel tanks covering the period Sept. 1, 2026, through Aug. 31, 2027, and substantiating the dispensation of 383,520 gallons of B20 into the 264

¹ Note, conversion factors are subject to change. Any updates will be reflected in the Alternative Compliance Guidance and the Petroleum Reduction Plan spreadsheet.

medium- and heavy-duty motor vehicles, are attached. Consistent with DOE’s Alternative Compliance Annual Reporting guidance and the B100 conversion factor found in Appendix D of the Alternative Compliance Guidance, the use of 383,520 gallons of B20 yields the following calculation:

$$383,520 \text{ gallons of B20} \div 5 = 76,704 \text{ gallons of B100}$$

$$76,704 \text{ gallons of B100} \times 1.05 \text{ GGE/gallon B100} = 80,539 \text{ GGE}$$

The total petroleum fuel use reduction achieved through the use of B20 therefore exceeded the target amount by 36,614 GGE (i.e., 80,539 – 43,925).

The following is a summary of results achieved during MY 2027. POI used two strategies to meet its petroleum fuel use reduction requirement of 47,400 GGE. POI’s first strategy involved using CNG to power 40 NGVs in its fleet. The actual result, which exceeded the target set forth in the Petroleum Reduction Plan, amounted to a reduction in petroleum consumption of 18,223 GGE. POI’s second strategy entailed the use of a biodiesel blend in the fleet’s diesel-powered medium- and heavy-duty motor vehicles. POI’s actual use of biodiesel in these vehicles during MY 2027 was 383,520 gallons of B20, which equates to 80,539 GGE of B100, an increase over the planned amount. In total, POI was required to reduce its petroleum consumption during MY 2027 by 47,400 GGE. POI achieved an actual petroleum fuel use reduction of 98,762 GGE, or 208 % of the required amount.

Strategy	Calculated Petroleum Reduction Requirement	Planned Petroleum Fuel Use Reductions (in GGE)	Actual Petroleum Fuel Use Reductions (in GGE)
Alternative Fuel (CNG)		14,162	18,223
Biodiesel Blend		43,925	80,539
Total	47,400	58,087	98,762

Note: Fleets should attach a copy of their Petroleum Reduction Plan to their annual report submission. The screenshot below is for example purposes only. Further, the following plan and values in the plan are provided ONLY as an example and likely do not resemble typical fleet use figures. The information below may not match the information in the preceding portion of this example report. As indicated in this report, fleets should also attach additional supporting documentation such as biodiesel pumping records.

Attachment: Petroleum Reduction Plan

Please see the “attached” Petroleum Reduction.

KEY	
	Enter data in cells with this color shading
	Select a value from the dropdown list
	Calculated values. Do not enter data in cells shaded in this color
	Error or unchecked required checkbox
	Information about working with the tables in this workbook

Fleet Identification (* required field)

Fleet ID Number:	1255
*Fleet Name:	Sample
Local name:	
Parent Organization:	
*Fleet Type (select from list):	P
*Mailing Address:	a street
	city
	CD
*City:	
*State:	
*Zip (xxxx-xxxx):	80401

Point of Contact Information

POC ID Number:	
*Name:	
Mailing Address (if different from fleet mailing address):	
City:	
State:	
Zip (xxxx-xxxx):	
*Phone:	
Fax:	
*E-Mail:	

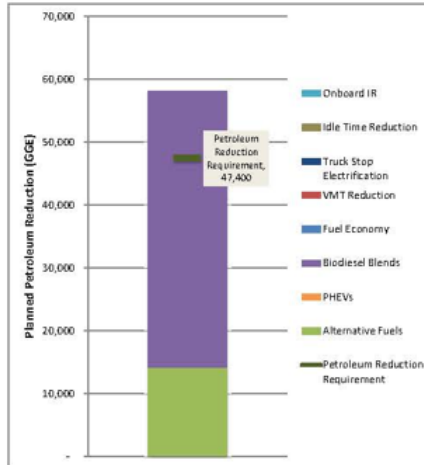
POC Name
903-555-5555
a_POC@trns.gov

(Parent Organization is parent company name, if applicable, for alternative-fuel provider fleet or state name for state fleets)

Enter the Reporting Model Year	2027	9/1/2026 to	8/31/2027
Enter you ACV Inventory Total	100	LDVs	<input type="checkbox"/> ACV Inventory
Enter the average fuel use per light-duty vehicle (LDV) in your fleet	479	GGE/LDV	<input type="checkbox"/> Avg Fuel Use
			<input type="checkbox"/> Calculation
			<input type="checkbox"/> Changing
MY 2027 Petroleum Reduction Requirement	47,400	GGE	

Click the button for each petroleum reduction method below to calculate the planned GGE reduction for your AC Waiver Request. The button for each category will take you to individual worksheets within this Excel file. Click on the "Planning Summary" button to return to this sheet.

Method	Planned Petroleum Reduction
Alternative Fuels	14,162
PHEVs	-
Biodiesel Blends	43,925
Fuel Economy	-
VMT Reduction	-
Truck Stop Electrification	-
Idle Time Reduction	-
Onboard IR	-
Total	58,087



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