



State of Wisconsin Clean Fleet Policy

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1. Overview

Starting with the Model Year 2027 (MY27) vehicle buy, all requested and purchased class 1-5 vehicles must be Alternative Fuel Vehicles (AFVs), unless the vehicle qualifies for an approved exemption.

Currently, Wisconsin's state fleet must comply with federal Energy Policy Act (EPA) rules requiring 75% of annual new light-duty vehicle purchases to be AFVs. Although currently compliant, the state increasingly relies on banked credits from prior years when AFV purchases exceeded targets; if this continues, those credits may run out, risking noncompliance and potential financial penalties. This Clean Fleet Policy will help ensure continued compliance with EPA and increase the number of credits for future use. For more information about EPA, please see Table 4.

For questions about this document, please contact OSCE@wisconsin.gov.

2. Implementation and Compliance

This policy covers vehicle classes 1-5 as defined by the Federal Highway Administration. These vehicle classes align with state vehicle procurement contracts. This policy will be implemented through the State Bureau of Procurement's (SBOP) existing vehicle procurement process. Vehicle requests and purchases will be reviewed by a committee, and vehicles that are deemed to be out of compliance with this policy will be referred to the DOA Secretary's Office for further review. The following information clarifies key aspects of this policy.

Eligible Alternative Fuel Vehicles

For the purposes of this policy, eligible AFVs are based on the definitions provided in Wis. Stat. § 16.045. Table 1 lists these eligible AFVs.

Table 1: This table defines acceptable Alternative Fuel Vehicles for the Clean Fleet Policy.

Vehicle Name	General Vehicle Definition
Battery Electric Vehicle (BEV)	A Battery Electric Vehicle is propelled solely by an electric motor that draws electricity from onboard batteries that can be recharged from an external power source.
Plug-In Hybrid Electric Vehicle (PHEV)	A Plug-In Hybrid Electric Vehicle uses a rechargeable battery that can be charged from an external power source to power an electric motor and also has an internal combustion engine using another fuel.
Hybrid-Electric Vehicle (Hybrid)	A Hybrid-Electric Vehicle combines an internal combustion engine with an electric motor and battery, where the battery is charged by the engine and regenerative braking rather than by plugging in.
Flexible Fuel Vehicle (E-85)	A Flexible Fuel Vehicle is a vehicle with an internal combustion engine designed to operate on gasoline or a gasoline-ethanol blend up to E85 (high-ethanol blend).
Compressed Natural Gas Vehicle (CNG)	A Compressed Natural Gas Vehicle is a motor vehicle that runs on compressed natural gas stored in high-pressure tanks and used to power its internal combustion engine.
Propane Vehicle	A Propane Vehicle is a motor vehicle equipped to run on liquefied petroleum gas (propane) in its internal combustion engine instead of (or in addition to) conventional fuel.

There are several other AFVs included in Wis. Stat. § 16.045 not in Table 1. While those vehicles do count as AFVs, they are not readily available commercially or through state contract.

Additionally, there are several products listed in Wis. Stat. § 16.045 that are drop in fuels for gasoline or diesel vehicles. While state fleets are encouraged to use those alternative fuels, they do not apply to this Clean Fleet Policy.

Finally, agencies and fleet managers who want to purchase fleet vehicles with the highest emissions reduction should review Table 5 in the appendix.

Eligible Exemption Criteria

This section lists eligible exemption criteria that may prevent agencies from purchasing an AFV. When filling out the Vehicle Request Form, agencies must indicate an eligible exemption criteria for any non-AFV vehicle purchases. Agencies must explain how the desired vehicle meets the selected exemption criteria based on the planned vehicle use.

Table 2: This table lists eligible exemption criteria for non-AFV purchases.

Criteria	Description
Cost	The total life cycle cost of an AFV is more than the cost of a comparable internal combustion engine (ICE) vehicle (not including costs for AFV refueling equipment). Life cycle cost analysis for ICE vehicles, Hybrids, PHEVs, and BEVs should be completed using this tool – Fleet Procurement Analysis Tool . For assistance with using the tool and default assumptions please contact OSCE@wisconsin.gov .
Prohibitive Upfits	The vehicle's use or function requires upfits or modifications that cannot be completed in the AFV options available in the vehicle category on state contract or the upfits for an AFV make the total cost of ownership more than a comparable ICE Vehicle.
Emergency Response	The primary use of the vehicle is related to emergency response and using an AFV would pose a concern for public safety (i.e. active pursuit vehicles for law enforcement or wildland fire response vehicles).
Safety	Refueling the vehicle in the field is required for regular transport routes and using an AFV would pose a concern to public safety because the vehicle's primary use is transporting individuals under the agency's jurisdiction and the expected transport distance would require refueling before returning to the duty station.
Vehicle Availability	There is not an AFV option for the vehicle type (i.e. sedan, SUV, truck, van) or required configuration available on state contract at the time of vehicle purchase and use of the vehicle cannot wait until an AFV becomes available.
Vehicle Range and Refueling Infrastructure	An exemption may be granted when a vehicle does not have access to on-site or nearby refueling or charging infrastructure and the nearest appropriate high-speed refueling or charging station is not within 20 miles or 20 minutes round-trip of the vehicle's primary duty station and typical operating area. For the purposes of this policy, a high-speed refueling station includes but is not limited to the vehicles and fueling stations below. • BEV: Level 3 (DC Fast Charging) Station • PHEV: Gasoline Refueling Station or Level 3 Charging Station • Hybrid: Gasoline Refueling Station • CNG: CNG Refueling Station • E-85 Vehicle: E85 Refueling Station • Propane Vehicle: Propane Refueling Station

Completing the Vehicle Request Form

Starting with the MY27 vehicle buy for passenger and law enforcement vehicles, light duty trucks, and cargo vans, the Vehicle Request Form, DOA-3016, and Vehicle Request Spreadsheet will include two additional questions. One question will include a checkbox/dropdown with eligible exemptions from the above table. The second question will include space for a short explanation of how the vehicle's use applies to the eligible exemption. Figure 1 shows the additional questions that will be included in the Vehicle Request Form. Table 3 provides examples of compliant and non-compliant vehicle requests.

Figure 1: This image displays the updated vehicle request form that fleet managers will fill out.

Clean Fleet Policy Compliance – Leave Blank if Requesting an Alternative Fuel Vehicle (AFV) Reason for AFV Selection. Please see Clean Fleet Policy for explanation of eligible exemptions. ☐ Cost ☐ Safety ☐ Prohibitive Upfits ☐ Vehicle Availability ☐ Emergency Response ☐ Vehicle Range and Refueling Infrastructure	Please provide a brief explanation stating how the requested vehicle fits the eligible exemption
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In Table 3, the columns highlighted in green represent vehicle requests that have been filled out correctly and would be approved according to the Clean Fleet Policy, and the column highlighted in red is an example of a request that would not be approved.

The first vehicle requested in Table 3 does not have to fill out the eligible exemption columns, as it is an AFV. The second vehicle is a gas vehicle and must fill out the eligible exemption section; however, since its primary use is as an emergency response vehicle, its exemption is accepted. The third vehicle represents a non-AFV exemption that would likely not be approved. Even though the ICE Kia Soul has a lower upfront cost than all available AFV SUVs, the lifecycle cost of comparable low-cost AFV SUVs is lower in many scenarios. Thus, cost would not be an eligible reason for non-AFV selection, although there could be another acceptable reason. As stated in the Vehicle Request Form and Vehicle Request Spreadsheet, the eligible exemption sections should be left blank if an agency is requesting an AFV.

Table 3: This table shows examples from the vehicle request spreadsheet that do and don't comply with the Clean Fleet Policy.

New Replacement Vehicle Model/Type (Do not need to be specific for Make)	Specify fuel type (Use Drop Down)	Eligible Reason for Non-AFV Selection (Use Drop Down)	Explanation of Non-AFV Selection (short)
Ford Maverick XL	Hybrid		
Ford Expedition MAX Special Service	Gas	Emergency Response	This vehicle will be primarily used for law enforcement
Kia Soul	Gas	Cost	The Kia Soul Gas vehicle is cheaper than the AFV Alternatives

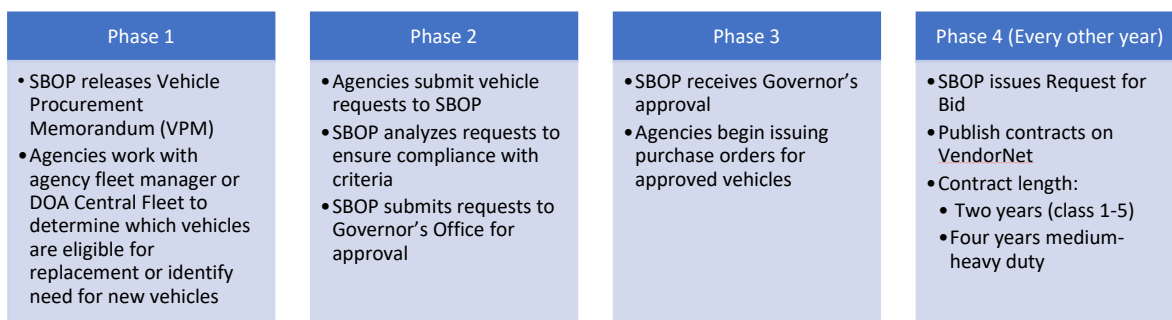
3. Appendix

Policy Authority & Fleet Procurement Logistics

Wis. Stat. § 20.915(1) states that all purchased vehicles require approval by the governor. This authority will be leveraged to ensure successful implementation of the Clean Fleet Policy.

The typical vehicle procurement cycle begins in June when the SBOP issues a Vehicle Procurement Memorandum to agencies. Agencies collaborate with their fleet managers or The Department of Administration (DOA) Central Fleet to identify vehicles eligible for replacement. They then submit requests for new vehicles to the SBOP, which reviews and analyzes the submissions before forwarding the approved vehicle list to the Governor for final approval. After the Governor's approval, fleet managers purchase vehicles from SBOP-published contracts. For more information, please see Figure 2.

Figure 2: This figure explains the existing process for vehicle procurement.



Policy Alignment with Existing Directives & Initiatives

Many existing directives and initiatives include fleet decarbonization goals or requirements. Table 4 lists them and highlights how they align with the Clean Fleet Policy.

Table 4: This table lists existing directives that align with the Clean Fleet Policy.

Initiative	Alignment with Clean Fleet Recommendations
State of Wisconsin Clean Energy Plan	“Work to transition the State’s vehicle fleet to clean fuels and zero-emission vehicles (ZEVs). The Wisconsin Department of Administration (DOA) encourages state employees operating state-owned or leased motor vehicles to use alternative fuels whenever feasible and cost-effective. DOA will work to replace state fleet vehicles and off-road equipment with those that can utilize lower-emitting fuels or low- to no- emissions. Consider not only the purchase price (reduced by any available incentives) but also projected operating cost savings (e.g., from using electricity instead of fossil fuels, reduced maintenance costs, and reduction of carbon and other emissions) by applying a reasonable cost for carbon and other pollutants reflecting their impacts. Also, explore options to build EV infrastructure at state parks and state-owned land (88-89)”.
Governor’s Task Force on Climate Change Report	“Adopt a policy of replacing state fleet vehicles and off-road equipment with EVs and electric equipment whenever it is cost-effective, considering total cost of ownership—purchase price (reduced by any Focus on Energy®, utility, or other incentives), projected operating cost savings from using electricity instead of fossil fuels, reduced maintenance costs, and reduction of carbon and other emissions (applying a reasonable cost for carbon and other pollutants reflecting their impacts) (37-38)”.

Initiative	Alignment with Clean Fleet Recommendations
Wisconsin State Statute	State statutes also encourage the transition to AFVs, including Wis. Stat. § 16.045(4), which says, “The department shall, whenever feasible and cost-effective, encourage all state employees to utilize hybrid-electric vehicles or vehicles that operate on gasohol or alternative fuel for all state-owned or state-leased motor vehicles whenever such utilization is feasible.” Additionally, the statute recommends a 20% decrease in gasoline use and a 10% decrease in diesel use by 2015.
Federal Energy Policy Act - State & Alternative Fuel Provider Fleets	The State of Wisconsin fleet is currently subject to federal “State and Alternative Fuel Provider Fleet” requirements established under the Energy Policy Act. This program requires covered fleets to ensure that 75% of vehicle acquisitions each fiscal year are AFVs. While the State of Wisconsin has remained in compliance with these requirements to date, it has become increasingly reliant on banked credits from prior years—when AFV acquisitions exceeded the annual requirement—to maintain compliance. If this trend continues, the state risks exhausting these credits and falling out of compliance, which could result in financial penalties.

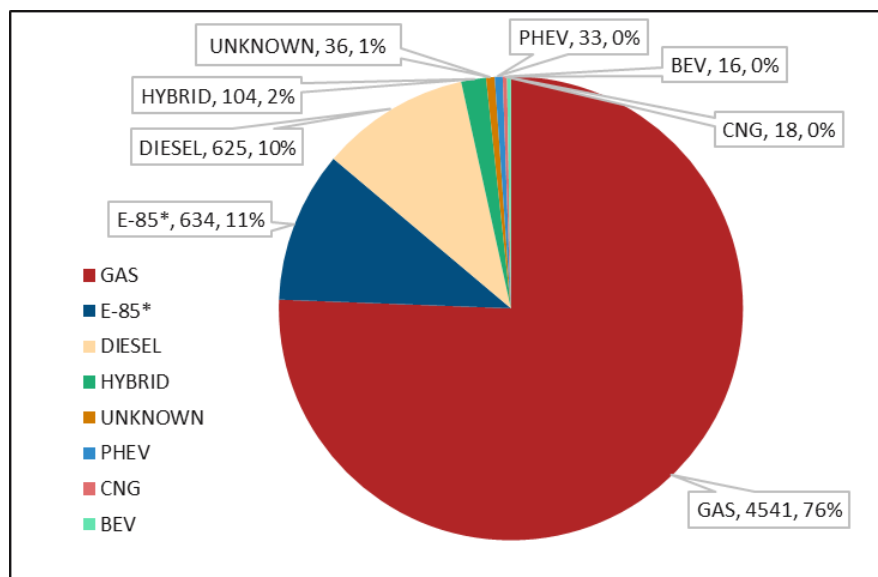
Current Fleet Makeup and 2026 Case Letter

Current Fleet Makeup

According to the Fiscal Year 2026 Active Vehicle Inventory, updated July 1, 2025, the Wisconsin State Enterprise Fleet currently has 6,007 vehicles. The fleet consists of a wide range of vehicle classes and fuel types. The following figures provide an overview of the existing fleet characteristics. The proposed policy only applies to class 1-5 vehicles which includes “Total Passenger”, “Total Light Duty”, and “Total Medium Duty” in the table below. Class 1-5 vehicles account for 96% of the vehicles in the state fleet.

Total Passenger	3406
Total Light Duty	2152
Total Medium Duty	234
Total Heavy Duty	215
Total Vehicle Count	6007

Figure 3: State Fleet FY2026 by Fuel Type (Quantity and Percent of Whole)

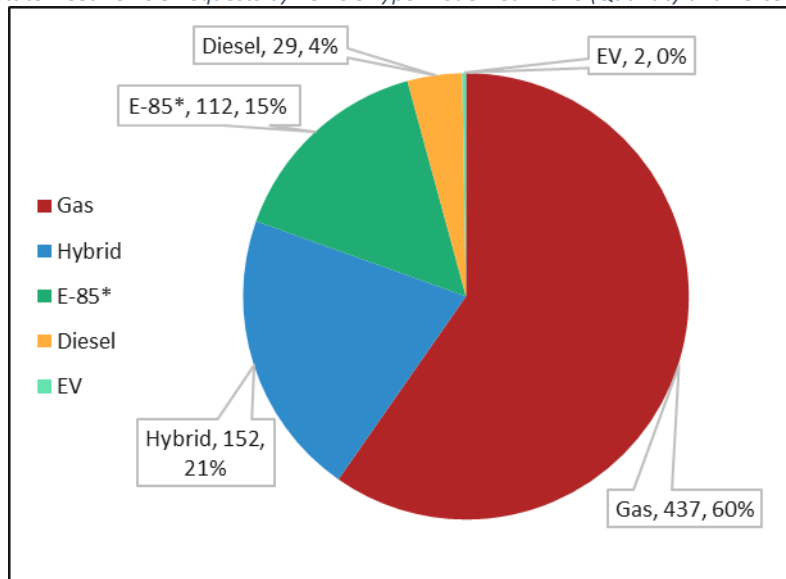


*E-85 vehicles can use both E85 fuel and regular gasoline

2026 Case Letter

In the 2026 Case Letter, 36% of the requested vehicles were AFVs. Among AFV requests, 58% were hybrids, 42% were E-85, and 2 were BEVs.

Figure 4: State Fleet Vehicle Requests by Vehicle Type Model Year 2026 (Quantity and Percent of Whole)



Alternative Fuel Vehicles and Emissions

While all listed eligible AFVs are suitable for the Clean Fleet Policy, it's important to recognize that they vary in their ability to reduce greenhouse gas (GHG) emissions. The following tables and charts, sourced from government websites and scientific papers, illustrate the comparative GHG reduction potential of different AFVs.

Table 5 summarizes an analysis from the Department of Energy's (DOE) [Alternative Fuels Data Center](#), ranking alternative fuels by their GHG reductions compared to a gasoline baseline—except for biodiesel, which is compared to diesel. Electric vehicle emissions are based on Wisconsin's electricity grid profile found in Figure 5. Notably, GHG reductions for BEVs and PHEVs vary depending on the grid's emission profile.

Table 5: Alternative Fuel GHG reduction based on DOE analysis

Alternative Fuel Type	Percent GHG Reduction	Sources
Battery Electric (BEV)	73% reduction	Alternative Fuels Data Center: Emissions from Electric Vehicles
Plug-In Hybrid Electric (PHEV)	59% reduction	Alternative Fuels Data Center: Emissions from Electric Vehicles
Hybrid Electric Vehicle	47% reduction	Alternative Fuels Data Center: Emissions from Electric Vehicles
Flexible Fuel Vehicle (E-85)	40% reduction – an average value that varies based on farming method	Alternative Fuels Data Center: Ethanol Vehicle Emissions, analysis by Argonne National Laboratory
Natural Gas (Compressed Natural Gas & Liquid Natural Gas)	15% reduction - this value increases if you have specific refueling infrastructure providing renewable natural gas (RNG)	Alternative Fuels Data Center: Natural Gas Benefits
Propane	13% reduction	Alternative Fuels Data Center: Propane Vehicle Emissions

Figure 5: Average emission profiles for Wisconsin and the United States from the DOE. Also displays annual emissions per vehicle based on fuel source and electricity grid makeup.

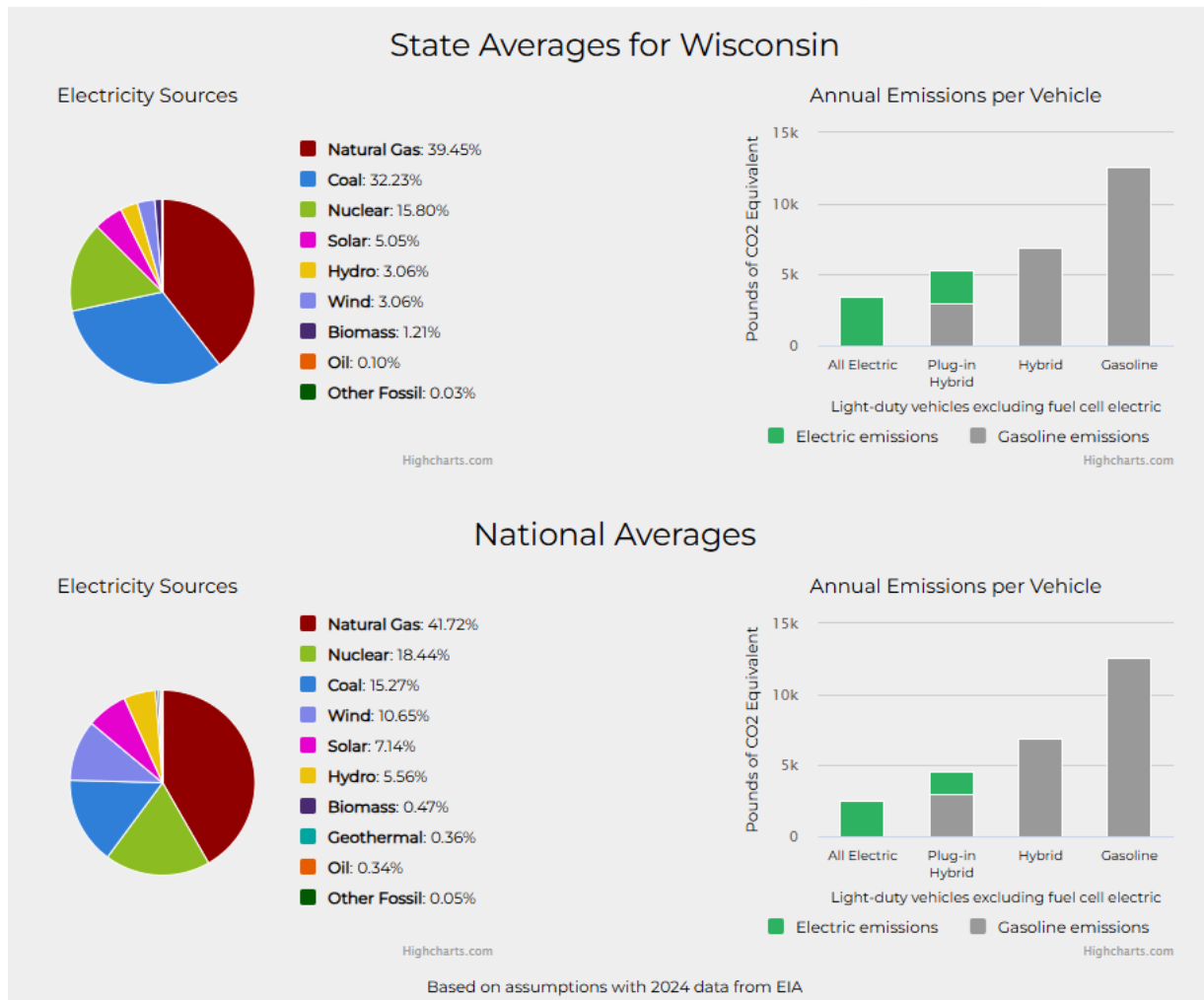


Figure 6 illustrates the GHG intensity of different AFVs, including gasoline and diesel baselines, using data from [DOE's Office of Vehicle Technologies](#). It expresses emissions in grams of carbon dioxide equivalent (gCO₂e) per mile and provides a "Cradle to Grave" assessment. This means it accounts for emissions from vehicle manufacturing, fuel production, and vehicle operation.

- The blue "Veh Cycle" bar represents GHGs from vehicle manufacturing.
- The orange "WTP" (Well to Pump) bar represents emissions from fuel production (also called "upstream" emissions).
- The gray "PTW" (Pump to Wheel) bar represents emissions from fuel use (also called "tailpipe" emissions).

"FCEV" refers to Fuel Cell Electric Vehicles powered by hydrogen. "FCEV NG" indicates hydrogen fuel cells where hydrogen is produced entirely from natural gas, whereas the other FCEV assumes 40% of the electricity used for hydrogen production comes from renewables.

For PHEVs and BEVs, the number following their acronym represents their electric range in miles. The label "US Mix" indicates that the emissions profile reflects the national average. Since Wisconsin's grid has a higher

emissions intensity than the national average, WTP emissions for the state would be slightly higher, leading to greater overall GHG emissions.

Figure 6: A comparison of vehicle lifecycle emissions based on fuel type from DOE's Office of Vehicle Technologies. For an explanation of abbreviations see the above paragraph.

