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RE: SCPPA Comments on the April 2, 2019 Workshop on the Proposed Advanced Clean Trucks Regulation

Thank you for the opportunity to provide these informal comments on the Advanced Clean Trucks workshop and the forthcoming regulation. SCPPA thanks CARB staff for their diligence in working with numerous stakeholders during this pre-rulemaking phase. We appreciate efforts to better understand our need to accommodate the utility sector's unique operational challenges in transitioning to all-electric trucks prior to the formal release of the regulatory proposal in October.

Heavy-duty vehicle technology has advanced tremendously over the last two decades. Through the South Coast Air Quality Management District's "Clean On-Road Heavy-Duty Public Fleets Vehicle" Rule 1196¹ – which is part of SCAQMD's "Clean Fleets Program" that was adopted in October 2000 – the majority of our publicly-owned Member utilities are required to purchase, lease, or contract for new heavy-duty trucks that are alternatively-fueled vehicles "certified by CARB." The goal was to reduce human exposure to air toxics and to improve air quality conditions in the South Coast Basin. Meanwhile, more stringent federal Environmental Protection Agency and CARB standards for heavy-duty highway engines set stricter emission standards and diesel fuel regulations. Diesel PM emissions have been reduced 99%+ and NOx emissions had been reduced 94%+. The U.S. Department of Energy had also provided significant funding to help develop and deploy advanced plug-in hybrid diesel systems for medium- and heavy-duty vehicle applications.

SCPPA believes that vehicle technologies have now surpassed the initial SCAQMD Board goals, and that both SCAQMD and CARB need to address that flexibility for utility fleet vehicles to accommodate our unique operational needs and the technical feasibility challenges with operating strictly all-electric trucks. Utilities need a diverse and reliable fleet of vehicles to maintain critical public infrastructure including both the electric grid and water supply system. When disasters strike, utility fleets are dispatched to repair vital infrastructure on a moment's notice to areas potentially far removed from their home service territory. Fungible fueling options are a critical necessity. Here are a few examples of such efforts and constraints:

- **Regional Disaster Response.** Southern California experienced a severe wind storm in 2011. Over 10% of Pasadena's customers were without power as the utility lost all but one power supply line into the City and ~100 transformers were damaged. It took over 20,000 worker-hours to restore power over three days with the assistance of other utilities. When Riverside Public Utilities provided crews to the Imperial Irrigation District and the City of Redding for work after serious weather events in 2017 and 2019, respectively, they were specifically directed ***not*** to send CNG equipment. In assisting Redding, Riverside rented diesel line trucks for their crews to help with power system restoration efforts 600 miles to the north. The same directive applied when Riverside committed specialized crews to help PG&E with wildfire restoration efforts.
- **Catastrophic Wildfire Response.** The effects of climate change have dramatically increased the size and intensity of California wildfires. Specialized utility workers and certain utility fleet vehicles (e.g., "bucket trucks") are needed to repair or rebuild electric systems. A mandate to procure *only* all-electric fleet vehicles would detrimentally harm these restoration efforts statewide as all-electric vehicles simply cannot operate continuously without a functioning electric system.

¹ <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1196.pdf>

- **Nationwide Mutual Aid Efforts.** Southern California-based utility crews collectively sent 122 vehicles and crews to the East Coast in response to former President Obama's request to assist with the 2012 "Superstorm Sandy" power restoration effort that left 6.2 million people in seven states without power. None of the vehicles sent were alternative-fueled because the Northeast simply did not have the fueling infrastructure available for CNG vehicles. Many regions across the United States do not. Compounding this problem, CNG trucks cannot be transported by air – which is the most expeditious means of transporting specialized crews and equipment to assist with a national public infrastructure emergency.
- **Regional Maintenance Efforts and Needs.** Utilities have numerous facilities that extend well beyond their limited service jurisdictions. There are oftentimes insufficient (or non-existent) CNG re-fueling stations in these typically-remote work areas. Furthermore, there are SCPPA Member service territories located near large earthquake faults that would most likely impact natural gas delivery in the event of a significant earthquake. In that situation, utilities would not even be able to fuel CNG fleets to maintain or restore their own service area(s).

We believe that utilities should be provided the ability to procure a "mixed fleet" of vehicles capable of responding to different demands and events. These would include "clean diesel" plug-in hybrid trucks, gas-electric hybrid "small" bucket trucks, and CNG trucks. Having a mixed fleet of vehicles would ensure that electric (and water) utilities are able to quickly and reliably respond to disasters, emergencies, mutual assistance requests, and operational demands when it matters most. Such a policy would both recognize that there are new and significantly improved engine technologies and ensure that critical public infrastructure restoration demands are not impaired.

Indeed, just as SCPPA Members have continued their efforts to reduce overall electric system emissions, additional investments have also been made in low-emissions conventional-fueled hybrid trucks with plug-in electric motors – which are the cleanest commercially-available option for fulfilling operational needs that best serves the ability to assist with restoration requests locally, regionally, statewide, and from around the nation. **We urge CARB to recognize these clean hybrid electric vehicles as PHEV options under the Advanced Clean Truck proposal.** Doing so would also encourage utilities to retire their oldest vehicles from their fleets, furthering California's climate- and health-based emissions reduction goals by procuring the cleanest vehicles that still meet the unique operational needs for public utilities.

Fleet Survey

SCPPA appreciates staff's noted desire to further work with stakeholders on the details of the "fleet reporting" aspect of this regulation. With a variety of members, in terms of both equipment and size, ensuring that the time and data provided meets CARB's goals the first time is important. We look forward to additional discussions on this issue.

Thank you for the time and attention to this matter.

Respectfully submitted,



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