



April 25, 2023

Liane Randolph, Chair,
And Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on 15-Day Proposed Advanced Clean Fleets Language

Dear Chair Randolph and Board Members,

I write to comment on the draft Advanced Clean Fleets (ACF) rule (posted on March 23, 2023). From the perspective of Riverside Public Utilities (RPU), any rule should enable and support our core mission of maintaining our systems and restoring service during emergency events. The proposed rule should include provisions supporting our mission, including allowing reasonable accommodations that prioritize the public health, safety, and welfare of our communities.

RPU is dedicated to achieving state and local climate goals. The electricity sector has been the primary driver of greenhouse gas reductions in the state. RPU is proactively planning for and investing in clean energy resources in order to achieve the ultimate goal of a carbon neutral economy by 2045. As part of this effort, RPU is helping electrify the transportation sector with affordable, reliable energy, which is critical to the widespread adoption of zero-emission vehicles. In addition, water and wastewater agencies are actively working to uphold the state's human right to water established by the Legislature, and to implement the state's various water quality, supply, and conservation goals to ensure California residents have access to clean drinking water now, and into the future.

We are committed to supporting a zero-emission vehicle (ZEV) transition by prioritizing purchasing ZEVs for our Public Agency fleets wherever feasible. While it is our goal to transition all of our fleet to ZEVs, there are circumstances where this is not possible, and the proposed Rule should acknowledge and allow for those circumstances. Specifically, we respectfully urge the California Air Resources Board to amend the rule in two ways:

- **The ACF rule must provide flexibility if a ZEV is not commercially available when a traditional specialty vehicle reaches the end of its useful life.**

Under the proposed ACF rule, if a ZEV is not commercially available to replace a traditional specialty vehicle, the utility must still purchase a ZEV unless the vehicle being replaced is 13 years or older. This 13-year threshold is not workable – it does not recognize the end of the useful life of utility specialty vehicles. The retirement schedule

for many POU's specialty vehicles is 7 to 10 years depending on model and usage. When a vehicle reaches the end of its useful life, it is critical that a utility can effectively replace the vehicle in order to maintain reliable utility service and emergency response capabilities. The ACF rule should delete the 13-year threshold and establish a practical standard based on a vehicle's end of life.

- **The ACF rule must be tailored to the emergency response needs of each utility.**

As demonstrated by recent extreme weather events in California, Public Agencies depend on their specialty vehicles to repair damaged infrastructure and maintain essential services that are critical to the public health, safety, and welfare of their communities. The proposed ACF rule contains a provision (i.e., the daily usage requirement) that attempts to provide accommodation if a utility can show, based on data from the last five years, that no ZEV is commercially available to meet utility needs. Unfortunately, the rule would expressly exclude the highest usage days from this analysis. High usage days are associated with responding to major disruptions in services. Those are the days when it is most critical to ensure utilities are appropriately equipped to repair damaged infrastructure and restore service. The ACF rule must account for these high usage days in order to ensure publicly owned utilities can protect their communities by effectively and efficiently responding to foreseeable emergency events.

On behalf of RPU, I urge CARB to make the aforementioned changes to the ACF rule which are essential to protecting the public health, safety, and welfare of our communities.

Respectfully,



Daniel E. Garcia (Apr 25, 2023 15:58 PDT)

Daniel E. Garcia

Acting General Manager / Deputy General Manager
Riverside Public Utilities, City of Riverside