



November 7, 2022

Nathan Dean
Mobile Source Control Division
Heavy Duty Off-Road Strategies Branch
Advanced Emission Control Strategies Section
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Sacramento Municipal Utility District's Comments on the 45-Day Language Proposed Regulation Order for In-Use Off-Road Diesel-Fueled Fleets

Dear Mr. Dean:

Sacramento Municipal Utility District (SMUD) appreciates the opportunity to comment on the 45-Day Language Proposed Regulation Order for In-Use Off-Road Diesel-Fueled Fleets ("45-Day Language"). We thank CARB for its continued efforts to engage utility stakeholders throughout this rulemaking process.

SMUD supports a comprehensive strategy to reduce greenhouse gas (GHG) emissions and particulate matter from vehicles in the state. We recognize that transportation is the single largest source of GHG emissions and achieving a cleaner fleet by 2045, where feasible, is critical to meeting California's environmental goals.

SMUD continues to be a leader in the move toward transportation electrification and the development of additional renewable resources necessary to meet the state's carbon reduction targets. We have taken a proactive approach to reducing our carbon footprint by having transitioned to renewable diesel in 2016 and electrified 100% of our fleet sedans in 2020.

Request Modification to Renewable Diesel Performance Requirements

The renewable diesel requirements would require fleets to use R99 or R100 renewable diesel in all their vehicles. SMUD has been procuring Hydrogenation Derived Renewable Diesel (HDRD) for our fleet for several years. However, given external circumstances such as domestic supply chain disruptions, we appreciate the inclusion of section 2449.1 (f) to address circumstances in which renewable diesel may not be procured through fleets' normal fueling methods

SMUD requests a modification to section 2449.1 (f) to address other circumstances in which renewable diesel may not be feasible. For example, SMUD has experienced issues with HDRD gelling and clogging inside our equipment at lower temperatures or higher altitudes. The gelling issue has occurred with several of

the HDRD fuel batches we received, and so far, the OEM has been unable to address this issue. In such circumstances, we have had to utilize diesel fuel as a replacement to renewable diesel in order maintain operability of the equipment. We are concerned this scenario would not be covered in section 2449.1 (f), as currently proposed, and request the exemption be modified to address circumstances where renewable diesel fueling is not suitable based on conditions in which the engine must operate. We recommend that CARB consider a waiver to accommodate the use of diesel fuel when renewable diesel is unusable.

Conclusion

SMUD appreciates the opportunity to comment on 45-Day Language Proposed Regulation Order for In-Use Off-Road Diesel-Fueled Fleets. We look forward to the ongoing dialogue with CARB staff as we strive together to formulate solutions to enhance the positive impacts of cleaner fuels and transportation options in the state.

/s/ _____
JOY MASTACHE, Senior Attorney
Sacramento Municipal Utility District MS B406

/s/ _____
KATHARINE LARSON, Government Affairs Regulatory Manager
Sacramento Municipal Utility District MS B404

/s/ _____
MARTHA HELAK, Government Affairs Representative
Sacramento Municipal Utility District MS B404

cc: Corporate Files (LEG 2022-0165)