



**Our Region's Trusted Water Leader**  
**San Diego County Water Authority**

October 17, 2022

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Valley Center  
Municipal Water District

Vista Irrigation District

Yuima  
Municipal Water District

**OTHER  
REPRESENTATIVE**

County of San Diego

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comment Letter — Proposed Advanced Clean Fleets Regulation**

The San Diego County Water Authority (Water Authority) appreciates the opportunity to provide comments on the proposed Advanced Clean Fleets Regulation, Public Fleet Requirements. We appreciate California Air Resources Board's (CARB) willingness to engage in dialog and respond to stakeholder feedback on the concerns of public fleets, including water and wastewater utilities.

The Water Authority is a regional wholesale water agency that provides about 80% of the water used in San Diego County, sustaining a \$253 billion economy and quality of life for 3.3 million residents through 24 member agencies. The Water Authority controls water deliveries to meet member agency demands, manages dam and reservoir operations, ensures facility security and emergency preparedness, protects water quality, oversees water treatment plant and power generation operations, maintains all vehicles and heavy equipment, and implements the Aqueduct Protection Program, among other functions. A reliable fleet is critical to our ability to meet our mission of providing a reliable and safe water supply in an affordable and sustainable manner.

While we appreciate CARB staff's work to incorporate stakeholder feedback, we still have concerns that this regulation, as written, may have unintended consequences on water and wastewater utilities that will endanger public health and safety, especially during emergencies.

Our letter sent on August 19, 2022 summarizes several of our concerns including a lack of Zero-Emission Vehicle (ZEV) availability, the ability to maintain a safe and healthy water supply especially during emergency responses, grid reliability and Public Safety Power Shutoff (PSPS) events, infrastructure requirements, and costs.

In this letter, we would like to focus on two key concerns: ZEV availability and grid reliability.

***ZEV Availability***

In order to provide a safe and reliable water supply, we require vocational vehicles with unique specifications including towing capacity; 4-wheel drive; power take off (PTO) features to power auxiliary items such as cranes, dump beds, and lift gates; meeting highway weight restrictions with batteries and auxiliary tools; the ability to idle for an extended period of time;

a substantial range on one charge; and the ability to remote-off-road charge where there is no access to the electric grid. These vehicles include dump trucks, welding trucks, valve trucks, utility trucks, and water trucks. **We have spoken with numerous vehicle manufacturer representatives, most of whom estimate that they will not have vehicle offerings in these categories for at least 5 years.**

Because the market is not yet ready for vocational ZEVs, commercial availability should be formally defined in the regulation to make sure that specific vehicles are available in sufficient quantities to provide a competitive bidding environment. We support the recommendations made by the Association of California Water Agencies (ACWA) in its October 17, 2022 letter that commercial availability for a Zero Emission Vehicle (or Near Zero Emission Vehicle through 2035), as it pertains to the Advanced Clean Fleets Rule purchase requirements, include the following considerations:

- Available in sufficient supply to be purchased and received in an acceptable time-frame comparable to available internal combustion emission vehicle (ICEV)
- Available from multiple experienced vehicle manufacturers as a zero-emission, powertrain certified model
- Meets required specifications (duty cycle duration, elevation, climate, disaster conditions)
- Sold for no more than 33% over retail price for ICEVs of the same vehicle configuration

### ***Grid Reliability***

Another major concern regarding the proposed regulation and corresponding accelerated electrification of public fleets is grid reliability including grid capacity and impacts from PSPS events. The heatwave experienced across the state in early September demonstrated that our grid capacity is already strained with current demands. This regulation will greatly increase the demand for electricity statewide. We do not feel an adequate analysis has been undertaken to assess how much this regulation will increase electricity demand and compare that with the planned build-out of electricity infrastructure in the form of generation, energy storage, and transmission and distribution infrastructure.

In addition to grid capacity concerns, we are concerned about how PSPS events will impact public fleets under this regulation. Extreme temperatures and drought have increased wildfire threat leading to an increased frequency and duration of PSPS events. The region that the Water Authority and its member agencies serves includes several high fire risk areas that have experienced PSPS events for days at a time. These interruptions in electricity would hinder public agencies with electrified fleets from being able to provide essential services. The rule should consider that there will inevitably be interruptions in electric service and should be written in a way that considers the implications of interruptions in electricity for up to one week.

While we appreciate CARB's work and support the end-goal of greenhouse gas reduction, it is imperative that the essential work that water and wastewater providers do is recognized and not impaired by this regulation. Both the commercial availability of the vehicles public fleets require and the grid reliability needed to ensure seamless essential operations do not align with the timeline of the proposed regulation. The regulation should either be revised to better account for deficiencies in commercial availability and grid reliability, or the timeline for public fleet

adoption should be pushed out to ensure real-world technology is ready for this groundbreaking regulation.

Thank you for the opportunity to comment on this very important rulemaking. We look forward to continuing our dialog with CARB staff to create a rule that is implementable, fair, and supports our mission of providing a reliable and safe water supply in an affordable and sustainable manner.

Sincerely,

A handwritten signature in blue ink, appearing to read 'E. Plajzer', with a long horizontal flourish extending to the right.

Eva Plajzer, P.E.  
Director of Operations and Maintenance