

October 14, 2022

CARB Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted Electronically

Subject: Proposed Advanced Clean Fleets (ACF) Regulation

Dear Chair Randolph, Vice Chair Berg, and CARB Board Members:

The California Chamber of Commerce (CalChamber) appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed Advanced Clean Fleets (ACF) regulation.

The CalChamber has more than 14,000 members which represents one-quarter of the private sector jobs in California. Our membership includes firms of all sizes and companies from every industry within the state. The CalChamber and its member companies continue to provide solutions that help to reduce greenhouse gas emissions, improve public health, and cultivate an environment that allows California to thrive.

As the industry works to rapidly implement California's aggressive climate goals and air quality mandates the state must also provide assurance the policy and regulations are workable, implementable, and that the necessary infrastructure is there for the success of all. The CalChamber would like to highlight specific concerns centered around electric vehicle availability, lack of infrastructure, and potential impact to providing essential services during emergency situations. These include the following:

Prolonged Grid Outage Impacts Essential Services and Contractual Obligations

Essential services will be hindered if the grid is incapacitated due to natural disaster or terror attack – especially given these disasters may have prolonged outages – when vehicles cannot be deployed to restore customer connectivity due to lack of charging abilities. Further, there may be contractual obligations, including state requirements, to restore connectivity for customers, and those service level timelines can differ depending upon the customer (e.g. quicker restoration for hospitals and critical buildings where lack of connectivity can directly impact life and safety.)

EV Charging Infrastructure Needs Time

Current infrastructure (grid and charging locations) is unable to support today's volume of electric vehicles on the road without years of infrastructure investment and development. Fleet vehicles operationally need to be able to charge to support vital customer connectivity and service level commitments and there is limited number of charging stations available as compared to the number of electric vehicles that will be in service in January 2024.

To ensure reliability and resilience this requires more than just a dedicated charging station for each vehicle such as a 220V station where the vehicle parks overnight. We must further consider if there is a power outage that takes the charging station offline. DC or Level 3 quick charging infrastructure is needed within a few miles of each of the fleet locations. These infrastructure investments may take 2-3 years to come online as they often need to be co-located to a substation since DC power is not typically in buildings.

Production Delays for Existing EV Models

Original equipment manufacturer (OEM) production capacity is limited and is not projected to provide the proper allocation of models to fulfill these requirements for several years. This does not account for near term supply chain issues that are significantly impacting every vehicle delivery including delaying delivery of electrified models. Commercial fleets must also consider OEM longevity. Given the operational conditions for these vehicles, businesses rely on the long-term certainty of sourcing EVs from a major OEM to ensure their product is supported and can remain operational for its entire useful life. This means even

when there is technically a commercially available product, we cannot rely upon a startup company that may go out of business, such as what has happened with [Electric Last Mile Solutions Inc.](#)

Lack of Existing EV Models to Meet Needs

Given the needs of a ¾ ton and higher pickup for an aerial vehicle application there are currently no ZEV models available that can drive the distances required for operational needs. Further, limited parts availability for new electric vehicle models creates extended downtime in the event of an accident or major mechanical repair.

The CalChamber and the business community are committed to investing in equipment needed to meet and exceed California's goals and mandates, however we seek your assistance in addressing the critical implementation issues. We stand ready to provide continued input and information needed for a successful implementable rulemaking.

Sincerely,



Ben Golombek
Executive Vice President and Chief of Staff for Policy