



April 9, 2021

Mr. Craig Duehring, Manager
Mr. Paul Arneja, Air Resources Engineer
Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812

**Re: Sacramento Municipal Utility District's Comments on the March 4, 2021
Advanced Clean Fleets Regulation Workshop**

Dear Mr. Duehring and Mr. Arneja:

SMUD appreciates the opportunity to comment on the proposed concepts presented at the Advanced Clean Fleets Regulation Workshop held on March 4, 2021. As always, we support CARB's continued efforts to engage utility stakeholders throughout this pre-rulemaking process.

SMUD has had an active Electric Transportation Program since 1990 and has been a leader in statewide electric vehicle (EV) policy development since that time. We recognize that transportation is the single largest source of the State's emissions and achieving a zero-emission vehicle (ZEV) truck and bus fleet by 2045 where feasible, is critical to meeting California's environmental goals.

SMUD is taking a proactive approach to electrifying its fleet, including the following actions:

- Ownership and operation of 25 JEMS hybrid-electric technology bucket trucks where the bucket is battery operated.
- Operation of 25 all-electric sedans and 25 hybrid sedans.
- Mid-2022 - purchase and evaluate five medium-duty, all-electric trucks (GVW 19,500 lbs.) from Zeus Electric Chassis.

Additionally, SMUD is a founding sponsor of the California Mobility Center (CMC), which promotes the policies called for in the Advanced Clean Fleets regulation. The CMC provides future mobility innovators and industry incumbents with access to programs and resources to accelerate the pace of smart and shared mobility solutions, fueling and charging infrastructure, and EVs for on and off-highway use.¹

SMUD supports a comprehensive strategy to accelerate the transition to ZEVs for high-priority fleets with vehicles that are suitable for electrification. However, we

¹ [Home - California Mobility Center](#)

also recognize the unique operational challenges of emergency response and specialized utility vehicles where electrification may not be a suitable option at the present time.

To accommodate the unique service requirements of electric utilities, we offer the following recommendations for CARB's consideration.

Early Action Incentives

We encourage CARB to consider incentivizing early action to provide public fleets with flexibility options to manage the overall purchases of ZEVs. A provision to recognize fleets that take early action to purchase an increased percentage of ZEVs beyond the compliance requirements may accelerate the adoption of EVs. An Early Action mechanism would also allow needed time for EV technologies to mature. An additional consideration could be providing early action credit for public fleets that downsize (i.e., eliminate a diesel vehicle without replacement).

There is already a viable precedent for Early Action pathways--the existing CARB Truck and Bus Regulation (Title 13 CCR § 2025 (j)) takes this approach. For example, if an agency purchased 70% of ZEV 2024-2026 model year vehicles during the first phase of requirements (e.g., 20% beyond the required 50%), the 20% could be used to reduce the required 100% of 2027 and newer model years to be purchased (e.g., only 80% of 2027 and newer model years would be required to be ZEVs).

Emergency Vehicles Designation

The Emergency Vehicles Designation in the Scope Summary should be expanded to include heavy-duty utility vehicles that support essential public services.

To ensure the resiliency of critical utility services, utility vehicles needed to support essential public services must operate under exceptional duty-cycles and in extreme conditions. For example, in storm situations (either heat, cold, wind or rain) and where multiple consecutive outages may frequently occur. In emergency situations, our crews regularly work 24/7 shifts, and our trucks must serve as safe shelter from the elements. Additionally, utility emergency vehicles may travel for consecutive shifts over multiple days. SMUD also provides emergency assistance to support emergency power restoration. In mutual aid emergencies, our crews must travel far beyond SMUD's service territory to access impacted areas to provide mutual aid in emergencies where charging capabilities are unknown. For example, in the past three years, SMUD crews have provided mutual aid in Puerto Rico, the Redding Fire, and Light Up the Navajo Nation in Arizona.

Snow removal and extreme weather is also a major concern at upper elevations where SMUD's extensive hydroelectric facilities are located (e.g., Loon Lake hydro-

electric facility in the Sierras). To sustain uninterrupted service for our customers, SMUD operates snow plowing trucks and mechanic trucks that support our operations.

Moreover, any time a vehicle needs to double as a shelter in inclement weather, the vehicle's power source must be reliable, readily available, and quickly replenished. Much of our core fleet also double as office space for the vehicle operator. These vehicles are essential to safeguard the safety of our crews and ensure grid reliability.

Regular daily use of aerial equipment, derricks, dump trucks, crew trucks, and line trucks need to be able to run for the duration of each job. Stopping, even intermittently, to charge any of these vehicles may pose safety and productivity risk.

Exemption Process for Public Fleets

SMUD urges CARB to include an Exemption Process for situations where no ZEV is available, or when a ZEV cannot meet fleet needs.

In special circumstances beyond the fleet owner's control--such as where no ZEV is commercially available--there should be a formal exemption process for public fleets. Any potential exemptions granted by CARB would include a "duration" clause with a bound on the exemption requiring periodic re-evaluation to accommodate evolving technology.

Specificity in framing exemptions to the policy may include the following criteria:

- By class or by weight (e.g., Classes 5-8 or 19,000-80,000 GVW) where EV technology is presently unavailable.
- By duty-cycle.
- Dependent on miles driven per year (e.g., >8,000 miles per year).
- If a utility seeks an exemption, then that exemption should be applicable for all utilities similarly situated.
- ZEV must be available from 2 or more "responsible and responsive" manufacturers:
 - Must meet the utility's specifications.
 - Manufacturer must qualify and have actively responded to the utility's Bid Request.
 - The product must be successfully piloted and tested (pilots are typically 6-12 months of continuous use).
- Cost threshold (e.g., ZEV is within 10% life-cycle cost of original vehicle).

Incorporation of real data to justify the need for exemptions (e.g., utilities must provide evidence that the available vehicles don't meet the harsh duty-cycle requirement when replacing a diesel-powered vehicle).

Annual Compliance Reporting

Streamline compliance reporting by eliminating the requirement that public fleets file periodic reports within 30 days of adding vehicles to their fleets.

SMUD fully supports the annual public fleet compliance reporting requirement proposed by CARB, to be submitted every May 1st. However, the stipulation of intermittent submittals "within 30 days of adding vehicles to the fleet" is needless and overly burdensome.

Several of our vehicles and aeriels are custom-built to meet SMUD's unique needs. Procurement and delivery of these vehicles may occur several times throughout the year and are subject to unforeseen delays that are beyond our control such as manufacturer material shortages, staffing constraints, shipping interruptions, etc. On any given year, the "30 day" reporting requirement could entail multiple report submittals, which is disruptive to our operations.

"Normal purchase cycle" is a misnomer in the utility industry. For drayage, a purchase cycle may be defined as 18 years or 800,000 miles. This is not the case for utilities where useful life of a heavy-duty emergency-response vehicle depends upon the annual volume of dispatches, or the ferocity and duration of emergency events, which vary greatly. Historically, SMUD's baseline purchase cycle fluctuates from 15 to 22 years for large bucket trucks measuring 65, 85, or 100 feet.

We recommend that CARB remove the 30-day requirement, and that mid-year fleet vehicle additions be incorporated into the annual compliance reporting that is due on May 1st.

Conclusion

The Advanced Clean Fleets is an innovative regulatory effort. This comprehensive regulatory strategy to ensure that the cleanest fleet vehicles are deployed in California to meet transportation needs is ground-breaking; SMUD enthusiastically supports its success.

While the initial focus of the Advanced Clean Fleets should be on high-priority fleets with vehicles that are suitable for early electrification, a one-size-fits-all approach could be detrimental to dependable long-term transportation electrification. SMUD welcomes the opportunity to work with CARB staff to develop a reasonable exemption framework where necessary.

As always, SMUD appreciates the opportunity to comment on the proposed Advanced Clean Fleets concepts. We look forward to the ongoing dialogue with CARB as we strive together to formulate solutions to enhance the positive impacts of EV adoption.

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

/s/ _____
MARTHA HELAK, Government Affairs Representative
Sacramento Municipal Utility District MS B406

cc: Corporate Files (LEG 2021-0051)