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California's transportation sector is the largest emitter of greenhouse gas emissions (GHG) and the Air Resources Board's (ARB) Advanced Clean Fleets (ACF) Regulation proposal is an important part of the solution, as are the state's efforts to roll out light-duty electric vehicles and charging equipment. We support efforts to curb GHG emissions through the deployment of zero emission vehicles where feasible.

At the same time, California's publicly owned electric utilities (POUs) and public water and wastewater agencies must be able to utilize the equipment, including essential vehicles, required to build and maintain the infrastructure for reliable and safe essential public services. CMUA is committed to making the regulation successful, but believes effective implementation includes ensuring the electric grid and water and wastewater service can, and will be, maintained for all.

CMUA has two key concerns with the current version of the draft regulation:

Problem 1: Fire, storm, extreme heat events and earthquakes all present emergencies that require deployment of medium- and heavy-duty fleet vehicles for multiple days or even weeks, often in remote areas where recharging is not possible. Current zero-emission vehicles (ZEVs) do not have the capacity to be deployed for multiple days or even weeks at a time in remote and rugged terrain where electric charging is not an option.

Proposed Solution: A POU or public water or wastewater agency should be able to purchase traditional utility vehicles for the share of their fleets that they reasonably need to respond to emergencies. The final regulation should provide reasonable flexibility to address each service provider's specific needs based on the size of the agency and service territory.

Problem 2: California's POUs and public water and wastewater agencies rely on specially constructed and upfitted vehicles like excavation trucks, line auger booms, and stake trucks with cranes, to build and maintain their systems. There are unaddressed questions about the actual market availability of compliant ZEVs that meet the required duty cycle for utility specialty vehicles.

Proposed Solution: The final ACF rule should incorporate clear criteria to identify commercial availability. These criteria should incorporate the needed technical and performance requirements to enable our field workers to maintain their systems safely and effectively. Only when vehicles are confirmed to be available to be purchased in the timeline and scale as needed by California's POUs and public water and wastewater agencies, should the purchase mandate be imposed.

CMUA believes that including important protections to ensure that the state's essential public services are maintained is consistent with the goals of the Advanced Clean Fleets proposed regulation and will help to further advance the state's clean energy and climate goals.