Good afternoon chair Randolph and Board members.

I’m Bob Shepherd, speaking on behalf of the California Caterpillar dealers.

As proposed, this regulation is not feasible for our industry and the industries we serve. Since 2019, and most recently in our June 20 letter to staff and our October 10 letter to your Board, we have detailed the many safety and functional risks arising from the staff proposals. We have repeatedly made this clear in meetings with staff, but none of the concerns have been addressed, and instead were too quickly dismissed without basis, leaving these issues unresolved.

With the existence of many power outages and the lack of DC power infrastructure for heavy-duty vehicles, dependence on electrical power for service, rental and transportation vehicles used in our specialized businesses that are crucial to construction and agriculture, and to critical equipment such as emergency generators at hospitals and floodwater and sewage control and fire containment equipment, will put lives in jeopardy, and will severely hamper services to these industries. Electric vehicles in this business model do not exist, even in design or prototypes, and somehow forcing them into existence will simply create unsafe and unfunctional vehicles.

In addition:

1. Rental electric heavy-duty vehicles such as water trucks and dump trucks are not feasible. DC electric power is unavailable in remote areas such as construction sites, forest areas, and agricultural fields.
2. Specialized service and transportation vehicles requiring power take off hydraulic equipment don’t exist.
3. There is no DC charging infrastructure available along the State’s highways for these vehicles. Our techs will unacceptably be stranded and left in remote, unsafe situations.
4. Infrastructure requirements for our large private fleets is remarkably cost-prohibitive.
5. Vehicles under 14,000# must not be excluded for daily mileage and ZEV unavailability exemptions because these vehicles for our industry are not available as presumed by staff.

As written, this regulation does not provide necessary exemptions for our business type, severely impairing our ability to respond to the many emergencies and service needs crucial to the operations of heavy equipment and emergency systems throughout our state. We ask the Board to direct staff to exempt heavy-duty rental and heavy-duty equipment repair vehicles and private not-for-hire heavy equipment transportation vehicles from this regulation. Without the exemptions for these vehicles, lives, safety, and progress in California are jeopardized.