

September 20, 2019

Paul Arneja
California Air Resources Board
Mobile Source Control Division
1001 "I" Street, 7th Floor
Sacramento, CA 95814

Dear Mr. Arneja:

Subject: Comments on the Proposed Draft Language for the Advanced
Clean Truck Fleet Reporting Regulation

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments to the California Air Resources Board (CARB) regarding the proposed draft language for the Advanced Clean Truck (ACT) Fleet Reporting Regulation. LADWP also appreciates CARB hosting the August 21, 2019 public workshop to discuss the regulation and provide feedback.

Section 2012.1 Reporting Forms – Form C

Proposed Section 2012.1 would require LADWP to submit the following forms:

- Form A: General Entity Information
- Form B: California Facility Type Questionnaire
- Form C: Vehicle Usage by Facility Form

LADWP has concerns with Form C because it would require LADWP to submit at least 130 Form C reports representing 130 facilities that station over 7,000 vehicles (as the rule applies to each facility that has at least one stationed vehicle). To complete all of these Form C reports, LADWP would have to gather and process detailed information on its very large fleet of vehicles in order to respond the following questions:

- What percent of fleet operates within the following "daily mileage bins": <50 miles, 51-100 miles, 101-200 miles, and >200 miles; and
- What percent of LADWP's vehicles fit within the following categories of vehicles:
 - a. Vehicles that regularly fuel on-site;
 - b. Vehicles that return to base daily;
 - c. Vehicles that have electronic tracking;

- d. Vehicles that stay within 50 miles of this site on a given day;
- e. Vehicles that regularly tow a trailer; and
- f. Vehicles that commonly operate at their weight limit.

For the reasons discussed below, this data collection requirement is unduly burdensome and is not necessary to achieve its goal of gathering information for the development of future ACT regulations (specifically to determine an appropriate point of regulation).

CARB Has Underestimated the Impacts of the Reporting Requirement.

According to the Standardized Regulatory Impact Assessment (SRIA), released on August 8, 2019, CARB staff believes it will take an average of four hours to put together at \$50 per hour for staffing, or \$200 to complete the report (Forms A, B, and C). CARB based its estimation on the assumption that “most large companies that own trucks or buses will have fleet software or other data management systems to pull information about their fleet and company quickly.”¹ This same assumption was reiterated in the August 21 public workshop where CARB staff claimed that all of the information sought under the proposed reporting regulation is already being collected and, as result, the incremental reporting burden would be minimal.

This assumption is not correct. LADWP, in fact, does not currently collect information to the level required to complete the Form C and, as a result, the collection of such information would require significant additional resources and efforts for a large entity such as LADWP. For this reason, LADWP believes CARB has significantly underestimated the resources and level of effort that would be required to complete the Form C reports. Most of the information on the form will require LADWP to coordinate with facility managers to gather and process the proposed reporting data. The SRIA does not consider the labor for large entities with a large amount of facilities and vehicles and underestimates the cost and amount of time it will take to complete the form. All facility managers would be tasked to keep track of every single vehicle going in and out of their respective facility. They would also need to log the destination of the trip, the purpose of the trip, and the mileage of the trip for every working day. Once the information is collected for 2020, then the data will need to be appropriated to the prompts in Form C.

Another concern relates to the public reporting of sensitive information. For example, some LADWP locations are considered to be confidential and this may cause security issues if the addresses are required to be submitted and made available.

Alternative Approach for Data Collection

LADWP recommends CARB to revisit the SRIA and provide a more realistic representation of the time and cost to comply with the reporting requirements. Based on the earlier statements, LADWP will need to use a considerable amount of resources to track data and

¹ California Air Resources Board, Advanced Clean Truck Regulation – Standardized Regulatory Impact Assessment, pg. 35

report it for over 130 facilities which can easily go over the 4 hour assumption and the \$200 estimate.

For these reasons, LADWP urges CARB to consider a more streamlined reporting requirement that would still gather the necessary information for the development of future Advanced Clean Truck regulations. In particular, we recommend simplifying the reporting procedure for Form C by having entities report on only one of the representative facilities that are identified in their Form B reports. This streamlined approach should provide CARB with the information needed to perform its regulatory analysis for development of the ACT regulations. In the case of LADWP, many of our facilities with assigned vehicles have similar operations related to the "Manufacturer/Factory/Plant," "Administrative/Office Building," and "Truck/Equipment Yard" categories. LADWP believes this will provide CARB a reasonable representation of what operations are occurring at LADWP facilities and thereby accomplish its goal of establishing a point of regulation.

Conclusion

LADWP recognizes that CARB needs to collect data to better understand the entities they are regulating. However, LADWP believes this can be done without the need to request a large amount of data while placing a reporting burden on large entities. Form C information can be simplified through representative facilities since LADWP has multiple facilities that have similar operational functions. It is also important to recognize the costs and resources within the SRIA for LADWP and similar large entities. The collection and data process takes time to complete to ensure that CARB is getting the best estimates possible.

LADWP appreciates the time CARB staff is using to collaborate with stakeholders and listening to feedback. LADWP looks forward to working together to ensure the reporting requirements efficiently captures the data CARB is looking for.

If you have any questions regarding these comments, please contact me at (213) 367-0409, or Mr. James Talavera of my staff at (213) 367-2987.

Sincerely,



Jodean M. Giese
Manager of Air Quality

JT:ae

via electronic mail to the "cleantrucks-ws" docket
c: Mr. Craig Duehring, CARB
Mr. James Talavera