



April 25, 2023

Nathan Dean
Mobile Source Control Division
Heavy Duty Off-Road Strategies Branch
Advanced Emission Control Strategies Section
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Sacramento Municipal Utility District's Comments on the Proposed 15-Day Modifications to the Proposed Regulation Order for In-Use Off-Road Diesel-Fueled Fleets

Dear Mr. Dean:

Sacramento Municipal Utility District (SMUD) appreciates the opportunity to comment on the Proposed 15-Day Modifications to the Proposed Regulation Order for In-Use Off-Road Diesel-Fueled Fleets ("15-Day Language"). SMUD supports a comprehensive strategy to reduce greenhouse gas (GHG) emissions and particulate matter from vehicles in the state. We have also taken a proactive approach to reducing the carbon footprint of our fleet by transitioning to renewable diesel in 2016 and electrifying 100% of our fleet sedans in 2020.

SMUD thanks CARB for its continued efforts to consider stakeholder feedback and appreciates the inclusion of limited exceptions to the proposed R99 or R100 renewable diesel fueling requirements. Specifically, we believe the exemption when fleets are unable to procure R99 or R100, or when fleets are experiencing cold-temperature winter conditions, will largely address our concerns about the risk of fuel gelling. To avoid any ambiguity, however, we request the Final Statement of Reasons clarify that CARB will consider R99 or R100 renewable diesel as available to procure only if it meets the applicable R99 or R100 specifications that are referenced within the definition in section 2449 (c)(49).

Clarification in Final Statement of Reasons Regarding Availability of Renewable Diesel

The 15-Day Language includes several exemptions to the R99 or R100 renewable diesel fueling requirement. For example, sections 2449.1 (f)(2)(C) and (D) exempt fleet owners from procuring renewable diesel during cold temperature months or certain low-temperature conditions, if specified criteria are met. Section 2449.1 (f)(3) exempts vehicles from the R99 or R100 refueling requirements when the fleet is unable to procure R99 or R100 renewable diesel through its normal refueling methods, provided the fleet owner maintains specified records and continues to seek to procure the fuel. SMUD believes these exemptions will largely address our

concerns about the feasibility and practicality of using renewable diesel for vehicles. However, as part of our investigation into fuel gelling that we recently experienced, testing suggests that some fuels labelled as R99 may not meet the applicable technical specifications that are referenced in the definition in section 2449 (c)(49). For example, in one test, some fuels clouded at 32 degrees Fahrenheit rather than the 20-degree threshold that CARB has proposed to conform with ASTM D975-21 temperature profile maps to estimate low-temperature operability requirements. It may pose operational challenges for SMUD if our fuel storage tanks are filled with a product that clouds at higher temperatures than expected and cannot be used to refuel vehicles in subsequent months.

SMUD is hoping to resolve the gelling issues directly with suppliers. However, we assume that any R99 or R100 renewable diesel that does not meet the technical specifications for the applicable fuel grade would not be considered available to procure, even if the product is offered for sale, for purposes of qualifying for the exemption in section 2449.1 (f)(3). To avoid any ambiguity regarding the meaning of “unable to procure”, SMUD requests CARB clarify in the Final Statement of Reasons that an R99 or R100 renewable diesel product will be considered available to procure only if it meets the applicable technical specifications for R99 or R100 at the time of use.

Conclusion

SMUD appreciates the opportunity to comment on the 15-Day Language. We look forward to the ongoing dialogue with CARB staff as we strive together to formulate solutions to enhance the positive impacts of cleaner fuels and transportation options in the state.

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

/s/ _____
KATHARINE LARSON, Government Affairs Regulatory Manager
Sacramento Municipal Utility District MS B404

/s/ _____
MARTHA HELAK, Government Affairs Representative
Sacramento Municipal Utility District MS B404

cc: Corporate Files (LEG 2023-0055)