

April 3, 2023

Clerk of the Board  
California Air Resources Board  
1001 I Street, Sacramento, California 95814

RE: Modifications for the Advanced Clean Fleets Regulation

Robinson Oil Corporation operates 36 "Rotten Robbie" petroleum and convenience stores in Northern California. We are an 85 year-old family business, employing approximately 300 people and serving the general public along with commercial customers. I am the Chief Financial Officer of Robinson Oil Corporation.

Robinson Oil Corporation respectfully opposes the adoption of modifications to the Advanced Clean Fleets rule as it continues its attempts to transition the transportation and goods movement economy much too quickly without sufficient regard for the necessary infrastructure overhaul in the state, a realistic consideration of the state's power grid capabilities, and the lack of an adequate and accurate cost analysis.

Modifications to the proposed regulation still does not address the significant increase in operating costs of the transportation and goods movement sector within the state, which will ultimately continue to harm our most vulnerable communities and residents the most. Furthermore, low-income households in the state are already bearing the brunt of increased electricity costs,<sup>1</sup> which will only be further intensified by the adoption of modifications to this regulation, as our unreliable grid continues to be strained beyond capacity. As a small business who takes great pride in serving our community, the impacts of the proposed rule and modifications to the regulation on the costs of goods and necessities, such as food, water, and fuel, are of grave concern.

Robinson Oil Corporation continues to have significant concerns with the limited availability and capability of heavy duty zero emissions vehicles. The insufficient range of the vehicles currently offered on the market will not adequately serve the needs of the transportation industry and will continue to create profound inconsistencies in our supply chains, even as modified. We urge the Board to consider the deeply unsettling ramifications of bottlenecks in our fuel, food, water, and medical supplies, in addition to every industry that moves goods on heavy duty vehicles within the state.

For these reasons, we must continue to respectfully oppose the adoption of the Advanced Clean Fleets rule as modified.

Sincerely,



Stephen F. White  
Vice-President, Chief Financial Officer  
Robinson Oil Corporation.

<sup>1</sup> <https://www.next10.org/publications/electricity-rates-2>