

April 6, 2023

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

RE: Modifications for the Advanced Clean Fleets Regulation

I am the 4th generation of our family-owned business, Robinson Oil. We own and operate 36 Rotten Robbie Fueling Stations with convenience stores, operate 5 fuel transports, and are a part of the CFN/Pacific Pride fueling networks. We employ around 300 people as retail employees, truck drivers, maintenance technicians, Commercial Fueling and office staff.

Robinson Oil 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 regulation's proposed timeline still do not address the significant strain on the transportation industry and will continue to gravely hamper goods movement in the state. Additionally, the cost of replacing fleets with entirely zero emissions vehicles will unduly harm small businesses in the state, many of which are family- and minority-owned. With the limited supply and options for heavy duty ZEVs, large companies with greater capital will be prioritized by manufacturers as compared to their small business counterparts. The highly restrictive timeline that continues to be proposed in the modifications will only serve to further exacerbate this problem in the market.

Additionally, the modifications do not substantially address the increase in operating costs of the transportation and goods movement sector within the state that will ultimately harm our most vulnerable communities and residents the most. Low-income households in the state are already bearing the brunt of increased electricity costs,¹ 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 continues to have significant concerns because the regulation's modifications do not sufficiently consider the current and future needs of the transportation industry within the state. The range of vehicles that are currently offered on the market will not ensure a seamless transition, as many heavy-duty vehicles are often used nearly continuously to ensure the timely delivery of goods to other businesses and consumers. Moreover, the infrastructure necessary to support a full transition to zero emission fleets is not prevalent enough to serve the vast number of vehicles CARB intends to replace. This regulation, even as modified, will be a major disruptor to the state's supply chains, which will increase the cost of goods at every level.

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

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.

Many small fleets, including our own fuel at our stations or throughout the network we are a part of. It is a significant capital investment to turn over these vehicles before their end of life. Most operate with very little downtime and are not conducive to the proposed changes at this time. Whether that is due to the weight they transport, time they are running or miles they travel. It would impact our ability to run our operations effectively and efficiently which ultimately drives up costs across all sectors. I believe with fuels such as Renewable Diesel coming on board, many of these goals can be reached through alternative liquid fuels which allow the use of the same engines and fuel infrastructure.

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

Sincerely,

Erin Graziosi

Erin Graziosi
President
Robinson Oil