



April 6, 2023

Mr. Tony Brasil
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Mr. Craig Duehring
Mobile Source Control Division
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Mobile Source Control Division
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RE: *TID comments on Proposed 15-day Changes to the Proposed Regulation Order Advanced Clean Fleets Regulation State and Local Government Agency Fleet Requirements*

Dear, Mr. Brasil,

Turlock Irrigation District ("TID") respectfully submits the following comments on the Air Resources Board's ("ARB") release of the 15 Day Regulatory Package for the Proposed Advanced Clean Fleets Regulation State and Local Government Agency Fleet Requirements.

Introduction

TID was organized as the first Irrigation District in California on June 6, 1887, and is currently in its 136th year of operation. Presently, the District owns and operates an integrated and diverse electric generation, transmission and distribution system that provides power to a population of 240,000 within a 662 square-mile area. Of the 14 communities TID serves, 11 are classified as Disadvantaged Communities according to the Department of Water Resources ("DWR") and the majority of our service territory is in the top 20% of Cal EnviroScreen 3.0 impacted communities. As one of eight Balancing Authorities in California, TID has a direct relationship with both commercial and residential customers. Our ethos is to provide stable, reliable, and affordable water and power to our customer owners, be good stewards of our resources, and provide a high level of customer satisfaction through clear, concise communication. As a Balancing Authority ("BA") TID is also tasked with balancing retail demand generation, and wholesale purchases and

sales, while providing adequate reserve capacity to maintain grid reliability. TID appreciates the opportunity to comment on the 15-Day Regulatory Package for the Local Government Agency Fleet Requirements and implores the ARB to consider TID suggestions as California seeks to reduce its overall greenhouse gas emissions (“ghg”) while also maintaining grid reliability and preserving public safety. The focus of TID’s comments consists of modifications to the 15-Day Regulatory Package that will better equip utilities such as TID to handle the fleet conversion implications brought on by the overarching goals of this regulation.

Discussion

I. Proposed Changes to Section 2013 (d)(1)(A)(B)

General Requirements. Beginning January 1, 2030 , fleet owners must comply with the schedules specified in subsections (1) or (2) below. The fleet owner may alternately elect to comply with the ZEV Milestones Option commencing with title 13, CCR section 2015.2 as described in section 2013(e). Renewing a vehicle lease for a vehicle that is already in the California fleet shall not be considered as a vehicle purchase for the California fleet.

(10)(1) Except as specified in section 2013(d)(2), fleet owners must purchase ZEVs or NZEVs as specified in section 2013(f), for their California fleet in accordance with the following schedule:

(A) Starting January 1, 2030 , 100 percent of the total number of vehicle purchases for the California fleet in each calendar year must be ZEVs.

TID encourages ARB staff to stronger consider a 2030 start date 100 percent vehicle purchases to be zero emission vehicles (“ZEV”). TID believes there is going to be an inevitability that most public agencies will be utilizing a combination of either the Unavailability Exemption and/or the Daily Use Exemption should CARB elect to stay with a January 1, 2024 50% purchase requirement. Public agencies must have adequate time to adjust their capital budget’s to account for associated ZEV cost which includes providing the public agency with the necessary time to design and deploy charging infrastructure and train personnel to handle ZEV vehicles. A 2030 start date also allows manufacturers additional time to develop vehicles that are compatible with the public agencies fleet operations and saves ARB from the administrative burden of having to review the large amount of exemption requests public agencies will be applying for over the next seven years as the heavy-duty ZEV market develops. For public fleets and agencies such as TID, a 20% increase in our capital budget would be a significant burden that a 2030 100% purchase requirement would alleviate. TID strongly urges the ARB to consider a 2030 start date to reflect the critical role publicly owned water and electric service providers serve in the community.

Discussion

II. Proposed Changes to Section 2013 (n)(2)(3)(4)

- (2) Daily Usage Exemption. Fleet owners may request an exemption from the ZEV purchase requirements of section 2013(d) to purchase a new ICE vehicle. Fleet owners must request and obtain this exemption pursuant to the criteria specified in section 2013.1(b) no earlier than when the model year of the ICE vehicle being replaced reaches 10 years old.
 - (3) ZEV Infrastructure Delay Extension. Fleet owners may request a temporary extension to count an ICE vehicle being replaced as a ZEV purchase when determining compliance with the ZEV purchase requirements of section 2013(d). The fleet owner must request and obtain the extension pursuant to the criteria in section 2013.1 (c) no - earlier than when the model year of the ICE vehicle being replaced reaches 10 years old.
 - (4) ZEV Purchase Exemption. Fleet owners must use the exemption in section 2013.1 (d)(1) or request the exemption in section 2013.1 (d)(2) no earlier than when the model year of the ICE vehicle being replaced reaches 10 years old:

TID strongly urges the ARB to change the model year date of thirteen years at which the Daily Usage Exemption, the ZEV Infrastructure Delay Extension, and the ZEV Purchase Exemption become usable for government fleets to ten years. Many utilities have their own board approved vehicle replacement policy by which they adhere. For TID, once a heavy duty vehicle reaches its eighth model year, among other criteria, staff perform an annual exercise to evaluate the heavy duty vehicle during the Capital Budget planning cycle for the following budget year. Once a vehicle has reached its eighth model year TID places this vehicle on a vehicle replacement candidate list for replacement. The ARB selecting the thirteenth model year date for all government fleets before exemptions become accessible strips utility governing boards from approving internal vehicle replacement policies which have been designed to fit the needs of the specific utility. A “one size fits all approach,” that would force utilities to hold onto vehicles until they reach their fourteenth model year would not only eliminate local control, but would also force utilities to modify their capital budgets and hold onto aging vehicles that may not be capable of performing the critical work necessary for emergency response. TID implores the ARB to modify this language to ensure agencies are able to properly access the existing exemptions written in this regulation. The consequences of not modifying this language include risks to public safety, financial strain for community owned utilities and the loss of local control.

Conclusion



TID appreciates the opportunity to submit comments on the proposed Advanced Clean Fleets regulation. As a publicly owned utility TID is committed to meeting California's public health and climate goals through reducing transportation greenhouse gas (GHG) emissions. TID strongly encourages the ARB to modify the thirteenth model year restriction prior to regulatory adoption to ensure utilities are able to continue to provide safe and reliable service to the communities they serve.

Respectfully submitted,

Austin Avery

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