

April 7, 2023

Clerk of the Board
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Comments on Proposed Advanced Clean Fleets Regulations

Tesla appreciates the opportunity to submit these comments in response to the Advanced Clean Fleets (ACF) 15-day proposed regulations issued by CARB on March 23, 2023. Tesla has been an active participant in this proceeding over the last several years and has offered our perspective in various forums, including through comments submitted in response to draft versions of the regulation issued by staff, as well as through participation in the various workshops and working group sessions that have been convened to date. In these comments, we incorporate by reference¹ the perspectives we offered in earlier submissions, both formal and informal.

Tesla continues to recommend the Board direct the following changes to the proposed regulations before they are finalized:

- The ZEV Milestone Option, available to High Priority and Federal Fleets, should be modified to better reflect the emissions impacts of heavier duty vehicles, like class 8 trucks.
- The High Priority and Federal Fleets regulation should incorporate credit generation, banking and trading provisions to provide obligated entities utilizing the ZEV Milestone Option additional compliance flexibility, reduce the need to rely so extensively on exemptions, as well as to promote early action and compliance beyond the floors set by the regulation.
- Near Zero Emission Vehicles should not be treated as equivalent to Zero Emission Vehicles for compliance purposes.

In addition to asking that the Board support these modifications to the draft regulations, Tesla also submits these comments to express our strong support for the acceleration of the 100% sales mandate, applicable to medium and heavy duty, zero-emission vehicles, to 2036. Recognizing the ongoing air quality challenges impacting the state generally, and vulnerable communities in particular, as well as the urgent need to dramatically reduce greenhouse gas emissions in the face of climate change, this action is wholly appropriate.

Sincerely,

/s/ Andy Schwartz

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¹ See Tesla comments filed on October 17, 2022; Tesla comments filed on May 13, 2022; Tesla comments filed on October 27, 2021.