September 27, 2021

Mr. Tony Brazil, Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814
zevfleet@arb.ca.gov

SUBMITTED VIA EMAIL

RE: Advanced Clean Fleet Regulation

Dear Mr. Brazil:

Thank you for the opportunity to comment on the proposed Advanced Clean Fleet (ACF) regulation during the informal rulemaking period. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of this rule and related policies and procedures.

WPGA would like to align ourselves with comments submitted a part of a coalition of organizations working to clean California's air and meet greenhouse gas emission goals. In order to meet air quality and climate goals, as well as federal attainment requirements, CARB should consider all low emission fuel types in any regulation or strategy. Heavy and medium-duty low-NOx trucks using renewable fuel are the most cost-effective way to address GHG and NOx emissions in the transportation sector, particularly in the near-term where zero emission technology remains widely unavailable.

Renewable fuels such as renewable propane provide a great opportunity to reduce GHG emissions today, without compromising power. Renewable propane is derived from sustainable sources like beef tallow or vegetable oil. Renewable propane is also completely fungible with current propane-fueled engines, vehicles, and fuel storage equipment, with no additional cost for fleets to transition to renewable propane.

In addition, there is already enough renewable propane available in the United States today to displace 15% of the fossil propane consumed in the California's transportation sector. WPGA is dedicated to helping California meet its decarbonization goals and has made a sustainability commitment to supply 100% renewable propane in California by 2030.The use of renewable propane, for example, in near-zero

propane trucks significantly reduces carbon and NOx emissions that must remain an important focus in order to meet federal attainment.

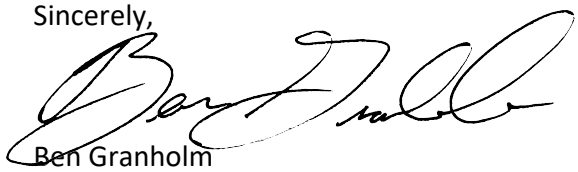
In terms of cost, CARB should continue to analyze the up-front infrastructure costs necessary to acquire new zero-emission technology. As currently drafted, the draft cost discussion document is not representative of the actual cost to transition to medium and heavy-duty zero emission vehicles. It was noted during the September 9th workshop that the cost analysis is based off a one-to-one vehicle replacement, when this is not what businesses are experiencing in reality. With duty-cycle and payload losses, we estimate that a ZEV replacement is at minimum 2:1, thereby doubling costs of both the vehicle and the infrastructure necessary to charge that vehicle. Replacement vehicles should be able to do the same duty-cycles without requiring significant changes to operations.

Furthermore, while there are estimated charger and infrastructure upgrade costs assumed in the document, there is no inclusion of the backup power necessary in the case of a power shortage. The need for energy diversity and resiliency remains vital in all sectors of our transportation network. WPGA strongly encourages the Board and staff to think holistically on how to best invest and regulate clean technologies to ensure the most significant NOx and GHG reduction impact and that the ACF rule should focus on the emissions reduction goals based on a complete energy lifecycle basis.

Finally, as noted by a number of stakeholders during the September 9th workshop, the process thus far has lacked transparency. Considering the proposed size and impact of the ACF regulation, stakeholders need plenty of time to vet and analyze rulemaking documents prior to adoption. While we are pleased with CARB staff's willingness to release draft language well in advance of the formal comment deadline and posting of questions and answers to the public website; the fact that the seven-hour plus workshop was not recorded is very disheartening. WPGA respectfully urges CARB to continue to increase communication and transparency throughout the remainder of the process, providing both staff, stakeholders, and rule the best possible chance to succeed.

Through fuel and technology innovation, propane is providing a path towards achieving emission reduction goals. We appreciate your work on the Advanced Clean Fleet regulation and hope the Board and staff will recognize the role that medium and heavy-duty low-NOx vehicles utilizing renewable fuels, such as renewable propane, have to play as the state strives for clean energy security and decarbonization in the transportation sector.

Sincerely,



Ben Granholm
Regulatory Affairs Specialist