

CalETC's comments on CARB's Advanced Clean Fleets AB 1594 Workshop
May 1, 2024

Dear CARB Staff,

The California Electric Transportation Coalition (CalETC) submits the following informal comments on the Advanced Clean Fleets (ACF) Workshop on AB 1594 held on March 25, 2024. We would like to thank CARB staff for all your hard work on this issue and willingness to incorporate stakeholder feedback into the process. Public agencies, including small publicly owned utilities (POUs), will need more flexibility to meet their ACF compliance requirements. Small public agencies and POUs are typically less well capitalized and need their vehicles to perform a wide variety of functions, especially those located in remote areas of the state and those that encounter extreme weather conditions. For those reasons, we make the following recommendations and look forward to continuing to work with you on these important amendments to the ACF rule.

CalETC agrees with staff's conclusion that AB 1594 has direct impacts on the ZEV Purchase and Daily Usage exemptions of the ACF rule. CalETC concurs with the definition in Public Utility Code § 224.3 as acknowledged by CARB in the ACF rule. CalETC recommends that a utility-specialized vehicle be defined as: all equipment in the Class 3-8 weight range capable of driving off-highway and low traction surfaces, or with a vocational power system (PTO or auxiliary), including but not limited to: digger derrick, bucket, underground and overhead cable pullers, crane (including service trucks with cranes), boom, water, dump, vegetation management/line clearance tree trimming, heavy-haul/lowboy, insulator washer, grapple loader, fault locating vehicles, and hydraulic excavators and sewer equipment, and specialized/customized vocational utility trucks.

CalETC recommends that a vehicle's end-of-life be determined and justified by an established procedure set by the public agency. We recommend deleting the 13-year threshold language prescribed in the ACF rule ZEV Purchase and Daily Usage provisions for public agencies and allow public agencies to submit a written justification for vehicles determined to be at the end-of-life. Examples of this public agency end-of-life justification could include, but not be limited to: odometer reading, engine hours or usage data (i.e., hours of stationary usage), vehicle condition (i.e., reliability and safety concerns), availability and affordability of maintenance and replacement parts, and the agency's vehicle retirement schedule. Public agency fleet managers review maintenance and repair costs, and if these costs are higher than the acquisition cost of a replacement vehicle then the vehicle is placed higher on the replacement schedule. An end-of-life determination that is tailored to the condition of the public agency's fleet and associated retirement schedule would provide these agencies with the predictability necessary to transition to zero-emission trucks. Finally, we recommend the Daily Usage exemption be amended to rely on a public agency's comprehensive usage data including the highest daily usage data as expressed in AB 1594. We recommend energy usage be measured based on the current vehicles in the fleet, whether they are zero-emission or internal combustion engine vehicles.

Thank you for your consideration and please do not hesitate to contact me if you have any questions.

Best regards,

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