



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

May 3, 2024

Submitted via ZEVFleet@arb.ca.gov

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

**SUBJECT: Comments on Proposed Amendments to the Advanced Clean Fleets Regulation (Implementation of Assembly Bill 1594)**

Dear Mr. Brasil,

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on California Air Resources Board's (ARB's) proposed amendments to the Advanced Clean Fleets (ACF) Regulation. At the March 25, 2024, informal regulatory workshop, ARB requested input on how to implement the requirements spelled out in Assembly Bill (AB) 1594 (Garcia, 2023) — Medium- and heavy-duty zero-emission vehicles: public agency utilities. The amendments will support public agency utility efforts to transition to zero-emission vehicles while continuing to meet mandates to maintain reliable water and electric service to California communities and respond to major disruption events.

Metropolitan meets the AB 1594 definition of water district, as defined in Section 20200 of the Water Code. As such, Metropolitan is providing the following comments to help facilitate the implementation of the AB 1594 requirements within the now active ACF Regulation.

**General Comments**

**Definition of "Traditional Utility-Specialized Vehicle"**

Metropolitan requests that ARB define "traditional utility-specialized vehicles." AB 1594 refers to "... *purchase replacements for traditional utility-specialized vehicles that are at the end of life... when needed to maintain reliable service and respond to major foreseeable events...*". In this regard, a traditional utility-specialized vehicle should be defined as all chassis and equipment in the Class 3-8 weight range that may be capable of driving off-highway and on low traction surfaces, and/or have a vocational power system (power take-off) or auxiliary power unit.

This category of specialized vehicles encompasses a variety of vehicles (e.g., digger derricks, bucket trucks, cranes, boom trucks, water trucks, cement trucks, dump trucks, heavy haul/lowboy trucks, vacuum trucks). Metropolitan also has specialized/customized vocational utility trucks that are upfitted with cranes, compressors, welders, valve operators, generators, etc. These vehicles must be able to perform in challenging service environments. Hence the need for all-

wheel drive, four-wheel drive, and 4x4 configurations to serve diverse utility applications, spanning off-road, off-highway, and limited traction conditions, while meeting specified load carrying capacity and towing requirements.

### **Determination of a Utility-Specialized Vehicle's "End of Life"**

Metropolitan supports the elimination of the 13-year minimum age requirement from select exemptions within the current ACF regulation. As cited previously, AB 1594 refers to "...purchase replacements for traditional utility-specialized vehicles that are at the end of life, as determined by the State Air Resources Board in consultation with public agency utilities...". Because the vehicle end-of-life determination can be so variable and unique to each vehicle, the requirement should not be based on age alone but on a set of criteria established by the public utility itself. The criteria should encompass various factors, including but not limited to hours of operation (both stationary job-site work and transit between job sites), odometer reading, reliability requirements, service type, availability of parts, safety considerations, affordability of maintenance, susceptibility to theft and vandalism, adherence to an established vehicle retirement schedule, and any other established criteria set by the utility to assess vehicle criticality. For example, high criticality would include those essential for mission-critical tasks, supporting emergency operations, or significantly impacting Operations and Maintenance and Capital Improvement Project activities.


### **Amendment of the Daily Usage Exemption**

Metropolitan supports amending the daily usage exemption to utilize the full usage history of a vehicle. As stated in AB 1594, for the purposes of determining the daily usage of a medium- or heavy-duty vehicle, a public agency utility should be allowed to provide comprehensive usage data for a class of vehicles that does not exclusively rely on the lowest mileage reading and does not exclude the highest usage days.

### **Conclusion**

We look forward to working with ARB and other public agency utilities to amend the ACF regulation in accordance with AB 1594 directives. If you have questions or need additional information, please contact Carol Kaufman [cykaufman@mwdh2o.com, (213) 217-6207] or Kiersten Melville [kmelville@mwdh2o.com, (213) 217- 7187].

Very truly yours,



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