



TUOLUMNE UTILITIES DISTRICT

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June 11, 2025

Clerk of the Board
California Air Resources Board (CARB)
1001 I St., 6th Floor
Sacramento, CA 95814

Subject: Challenges in Advanced Clean Fleets Compliance

Dear California Air Resources Board,

Tuolumne Utilities District (TUD) appreciates the opportunity to provide feedback on the proposed Advanced Clean Fleets (ACF) Regulation. As a water and wastewater utility provider serving approximately 44,000 residents and businesses in Tuolumne County, we fully support CARB's goal to achieve zero emissions. However, we have encountered significant challenges while planning for ACF compliance, particularly in balancing this compliance with our obligation to maintain essential public services during emergency events.

TUD operates in the foothills of the Sierra Nevada Mountains, across elevations between 2,000 and 4,500 feet, where severe weather events such as blizzards, floods, and wildfires are common. Our fleet—comprising specialized vehicles such as vacuum trucks, water trucks, tractors, and excavators—is critical for maintaining public safety and responding to emergencies. These vehicles often operate for extended periods in remote areas, requiring long-distance travel and reliable fueling options. Unfortunately, the real-world availability of zero-emission vehicles (ZEVs) that meet these operational needs is extremely limited at best, which poses significant barriers to compliance.

Additionally, TUD's on-call employees must promptly respond to emergencies 24/7 by taking district vehicles home. Zero-emission vehicles would need significant charging downtime between uses, potentially delaying emergency responses and forcing TUD to purchase an additional fleet of vehicles, an unsustainable financial burden for our district's ratepayers, many in disadvantaged communities.

Furthermore, frequent power outages caused by Public Safety Power Shutoffs (PSPS) and Enhanced Powerline Safety Settings (EPSS) exacerbate these challenges. These outages often leave us operating entirely on backup power, which limits our ability to charge and maintain zero-emission vehicles effectively. During extended outages, such as those lasting multiple days, critical services may be jeopardized without reliable fueling options for our existing fleet. With the increasing prevalence of these outages in our region, the need for flexible exemptions in fleet compliance becomes even more urgent.

Given these challenges, TUD respectfully requests greater flexibilities in exemption pathways for public fleets to include vehicles that directly support critical infrastructure for public health and safety, such as water and wastewater repair vehicles. Without such exemptions, essential services could be compromised, particularly during extreme weather events or power outages that frequently affect our region.

TUD Mission: *To provide responsible water and wastewater services for our customers with great customer service in a socially, financially, and environmental responsive manner at a fair value.*

TUD has undertaken the following measures to assess the feasibility of transitioning to ZEVs where applicable. This evaluation process has included:

- Reviewing available ZEV options for specialized utility needs and identifying gaps in current technology.
- Exploring infrastructure upgrades to accommodate ZEV charging and fueling capabilities.
- Developing cost estimates for fleet replacement and charging infrastructure, taking into account the substantial financial investment required.

Notwithstanding these efforts, TUD anticipates considerable compliance challenges in the forthcoming years, specifically from 2026 to 2035. During this timeframe, the absence of adequate Zero Emission Vehicles (ZEVs) for heavy-duty and off-road applications, along with the financial burden associated with fleet replacement and charging station infrastructure, is likely to impede full compliance.

TUD appreciates the challenges CARB faces in implementing the ACF Regulation and supports its environmental goals. However, without adequate exemptions and flexibility, the regulation risks compromising essential services that protect public health and safety. We respectfully urge CARB to consider expanding exemptions for public utility fleets and addressing the technological and financial barriers to compliance.

Thank you for your consideration. Should you have any questions or require further information about our position, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Don Perkins".

Don Perkins
General Manager