



California Council for Environmental and Economic Balance

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September 15, 2025

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

[Electronic submittal](#)

Re: CCEEB Comments on Proposed Amendments to the Advanced Clean Fleets Regulation

Dear California Air Resources Board.

On behalf of the members of the California Council for Environmental and Economic Balance (CCEEB), thank you for the opportunity to provide comments on the California Air Resources Board's (CARB's) proposed amendments to the Advanced Clean Fleets regulation. CCEEB represents public agency utilities (PAUs) as well as both on- and off-road mobile source operators, large fleet owners, entities producing and delivering electricity, hydrogen fuel, and conventional fuel. As such, CCEEB has actively participated in the development of CARB's Advanced Clean Fleets Regulation and its amendments as specified in AB 1594.

1. Daily Use Exemption requests should utilize the same methodology, no matter who owns the Traditional Utility-Specialized Vehicle.

Given that Staff has expanded the scope of the proposed changes beyond those required by AB 1594, CCEEB reiterates our request from our November 14, 2024, and May 3, 2024 letters that CARB allow all fleet owners that operate Traditional Utility-Specialized Vehicles, not just public agency utility (PAU) fleets, to seek a Daily Use Exemption. The idea that a bucket truck operated by a public agency utility will be treated differently than a bucket truck operated by a non-PAU creates additional complexity and market disruptions, and therefore we suggest expanding this methodology to all Traditional Utility-Specialized Vehicles.

2. Suggested changes to the Daily Usage Exemption calculations for Public Agency Utilities.

CCEEB supports the provision in Section 2013.2(b)(4) allowing the three highest usage days for the Daily Usage Exemption to remain in the calculation for PAUs.

In addition, because all available vehicles in a PAU's fleet may be deployed to respond as soon as possible during emergencies, CCEEB requests that the Daily Usage Exemption calculation method be based on the highest readings of each day rather than the lowest of each day.

3. ZEV exemptions for Traditional Utility-Specialized Vehicles operated by PAUs should not be limited to vehicle replacements.

Another issue of concern for CCEEB is the restriction on exemptions which limit their applicability to only replacement vehicles. At the workshop, CARB Staff responded to a question focused on this issue by stating the exemptions are for events outside a fleet's control, and that adding a vehicle is "within the control of the fleet". This is not the case for PAUs that have a mandate to serve, be it water quality, water supply, electricity, or gas services. Limiting the ability to get an exemption for a vehicle that wasn't in the fleet at the time of ACF adoption, is akin to limiting the ability of the public agency to do its statutory duty. If the utility needs another vehicle, and there are no ZEVs available, the rule is tantamount to a prohibition to serve. Therefore, CCEEB requests the following modification to the ACF, where applicable (Daily Use Exemption, ZEV infrastructure Delay Extension, ZEV Purchase Exemption):

"...as an ICE vehicle being replaced, or added to a fleet after the effective date of the rule for the purpose of serving additional load, growth, or expanded service territory, ...:

4. Staff should recognize safety concerns associated with hauling hazardous materials with Zero-Emission and Near Zero-Emission Trucks and request the removal of these "Tractors" from the list of vehicles not eligible for the Mutual Aid exemption when Near Zero-Emission Vehicle (NZEV) alternatives are present.

CCEEB recommends excluding "tractors" that haul extremely hazardous materials, such as gaseous chlorine, from the list of vehicles not eligible for the Mutual Aid exemption when NZEV alternatives are present. Our members use tractors to transport gaseous chlorine to our facilities, particularly during emergencies. CCEEB is concerned about the implications of using lithium-ion battery-powered tractors in the event of a fire or accident that could lead to a runaway reaction. The heat generated in such situations could potentially cause a catastrophic rupture of the chlorine

container, posing a significant risk to human health. This rare, but disastrous, occurrence is true whether a ZEV or NZEV tractor is used. As such, CCEEB supports its water agency members in exempting tractors that transport extremely hazardous materials from the list of vehicles not eligible for the Mutual Aid exemption when NZEV alternatives are present.

Thank you for the consideration of our comments. Please feel free to contact me at petero@cceeb.org or 925-339-3500 for further information or discussion.

Sincerely,



Peter Okurowski
Policy Director
CCEEB