



WATER AND POWER

September 15, 2025 | Submitted Electronically

Chair Liane Randolph and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on 45-Day Proposed Advanced Clean Fleets Language

Dear Chairman Randolph and Members of the Board,

Burbank Water and Power (BWP) is a community-owned utility that provides reliable, affordable, and sustainable water and electric services to more than 50,000 residential and business customers in the City of Burbank. Known as the “Media Capital of the World,” Burbank boasts more than 1,000 media and entertainment companies, such as Walt Disney Studios, Warner Bros., and Nickelodeon. As a publicly owned utility, we are focused on transitioning to zero-carbon energy while providing the lowest rates to our residents, businesses, and especially to our disadvantaged communities.

BWP supports the state’s goals to decarbonize by proactively electrifying our fleet. 80% of our car fleet is electric, and we have a first-generation class 6 all-electric step van. We have replaced three propane forklifts with electric forklifts, we are replacing our dirty diesel dump trucks with cleaner gas-powered dump trucks, and we recently switched to renewable diesel fuel in our fleet to reduce emissions.

BWP has been a leader in vehicle electrification. In 2011, we installed our first electric vehicle (EV) charger, and over the last fourteen years, BWP has installed 59 public chargers and 64 BWP employee/fleet chargers to support our community. We also created an in-house EV charger maintenance and repair program, which ensures that our public chargers have an uptime of over 99%.

The California Air Resources Board (CARB) passed the Advanced Clean Fleet (ACF) rule, mandating that public fleets purchase zero-emission vehicles (ZEVs). However, the legislature has recognized utilities’ critical role in keeping the grid operating, passing Assembly Bill 1594 in 2023. This bill, among other things, created accommodations for Publicly Owned Utilities (POU) if a ZEV is not available or capable of meeting emergency response or grid reliability needs.

We have been able to meet with CARB staff to discuss our concerns regarding the implementation of the ACF rule, especially for medium- and heavy-duty specialty vehicles. Despite the outreach, we still have concerns about the proposed implementation language.

As California moves to decarbonize, keeping a stable and reliable grid becomes increasingly critical. One critical component of maintaining a reliable grid is having vehicles that can respond to an emergency.

While we were not directly impacted by the Palisades and Eaton fires, the winds heavily damaged our electrical distribution system. 17,000 customers lost power, or 32% of our customer base. Additionally, critical infrastructure lost power. Burbank has an operable unit that cleans our Superfund Site (a superfund site is a federally designated contaminated site). This unit went down for 7 hours. Our water reclamation plant went down for 10 hours. With these two critical water units down, Burbank had less water to use. Finally, we nearly lost our intertie connection with the Los Angeles Department of Water and Power (LADWP), which would have resulted in Burbank losing power for up to three days.

On January 7, 2025, our crews responded to the emergency. They worked for 10 days (3 days of emergency response, 7 days of emergency recovery), repairing and restoring our local distribution network. Normally, we could count on mutual aid in an event like this; however, our closest partners (Los Angeles, Glendale, and Pasadena) were more heavily impacted by the Palisades and Eaton fires. Thus, we needed to respond to the emergency without outside help.

There are a few important lessons learned from the January 7, 2025, event:

1. Fleet Deployment: Our crews worked around the clock during this event. Our utility vehicles rarely returned to the yard; they were onsite repairing our distribution network. Trucks often stayed in the field, and the crews rotated on and off them. An electric truck would not be able to stay in the field this long; it would need to be hooked up to a power source to recharge. In this situation, it would not have been practical for in-field charging due to the conditions.
2. Safety: Our crews worked in dangerous situations during this event. Forcing a vehicle to return for charging loses time for vital emergency repairs and creates a situation where the truck may not be able to return to the yard/repair site due to debris. Standard industry practice is to finish an emergency repair before leaving the site.
3. Recovery Time: Our distribution system was fully restored on Saturday, January 11, 2025. Using a fully electric fleet would have pushed out that time. As an example, one electric bucket truck model with a separately powered boom can only work in the field for 6-8 hours before needing to recharge the boom. Fully charging the boom would take about 5 hours since it can only be charged with a Level 2 charger. This would have delayed repairs by an extra 4 days. It also does not account for needing to recharge the truck once the battery begins to be depleted, which would likely take an additional 1 to 2 hours with a DC fast charger.

We have several concerns with the present rulemaking:

- ZEV Purchase Exemption
- Mutual Aid and Emergency Response Exemption
- Daily Usage Exemption

ZEV Purchase Exemption: Burbank Water and Power currently has 103 vehicles in our fleet (60 light duty, 18 medium duty, 30 heavy duty). Our service area is a fully built-out community, with no available land to expand its existing operational footprint. All fleet vehicles are housed on the City's 10-acre headquarters campus, which is at full capacity. As such, the City does not have the ability to accommodate additional vehicles, and every vehicle in the fleet is essential to ongoing operations. Due to these space constraints, each vehicle must be fully utilized and equipped with towing capacity to ensure the transport of equipment and materials to the required job sites.

Specifically, we need vehicles capable of towing. Due to our limited space, we need to fully utilize the vehicles we have, including towing equipment to job sites. Additionally, we need to purchase new/additional 4x4-capable medium-to-heavy-duty vehicles due to projected upgrades to our hillside community. These upgrades are for our 4kV to 12kV upgrade and proactive infrastructure for fire safety.

We recommend that any CARB rule acknowledge the needs of local fleets. CARB should implement a flexible rule that allows agencies to provide proof that truck manufacturers are not meeting the specific needs of utilities.

Mutual Aid and Emergency Response Exemption: Current medium- and heavy-duty specialty vehicles do not meet our requirements to provide mutual aid. BWP is a member of the Southern California Public Power Agency (SCPPA) and provides mutual aid for the other member agencies as needed. SCPPA's members include the City of Anaheim, the City of Azusa, the City of Banning, the City of Cerritos, the City of Colton, the City of Glendale, the Imperial Irrigation District (IID), the City of Los Angeles, the City of Pasadena, the City of Riverside, and the City of Vernon. SCPPA's members serve more than 5 million Californians (2 million customers) across a service area of 7,000 square miles.

In 2022, BWP provided mutual assistance to IID. IID is 217 miles from the BWP campus. Our vehicles need the flexibility to transit to our partner agencies and operate in the field with a readily available fuel source. We also have a mutual aid agreement with the American Public Power Association (APPA). For decades, BWP has been a signatory of the APPA mutual aid agreement. This agreement details the mechanism by which POU's can give and receive mutual aid nationwide. In 2011, BWP sent five utility trucks to Long Island, New York, to assist in the recovery efforts from Superstorm Sandy. As California electrifies our society, it becomes more vital that we have vehicles that can respond in emergencies and keep the power flowing.

We need vehicles ready to provide mutual aid at a moment's notice. Current ZEVs do not have the range capabilities to meet our mutual aid assistance requirements, and ZEV charging infrastructure makes these vehicles unsuited for mutual aid assistance, especially in rural areas.

We recommend that CARB allow for a percentage (up to 25%) of medium-to-heavy duty vehicles to be set aside for mutual aid and emergency response.

Daily Usage Exemption: The proposed rulemaking calls for utilities to provide vehicle daily use to be eligible for exemption based on usage needs. We are concerned about this requirement for several reasons; First, Burbank does not have telemetric data on our vehicles, nor do we have historic data to provide. Therefore, complying with this proposed rule will be challenging for our current operations. Second, the proposed rule is not aligned with AB 1594, which called for “not exclusively relying on the lowest mileage data reading”. We recommend that CARB allow for a flexible approach, such as fuel equivalency, which would be a much simpler approach while still achieving the CARB goal, understanding how ZEVs are performing.

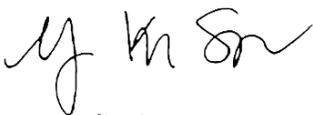
Conclusion

BWP is committed to moving towards a zero-carbon future. At the same time, we need to ensure the reliability of our grid, especially during emergency situations. BWP projects that our load growth will increase by 134 MW in 10 years, a 40% increase. In order to serve our community effectively, we need utility vehicles that can manage increased electrification while maintaining the reliability our customers have come to count on.

The City of Burbank has local goals to fully electrify our city fleet by 2045. While not part of this rulemaking, CARB should consider the immediate cost impacts of implementing the rule versus a longer runway to allow utilities to invest in ZEVs that can be spread out over years, thereby reducing any immediate ratepayer impacts. This is especially important while electric rates are already being impacted by compliance with the state's energy goals, such as SB 350 and SB 100.

We ask that CARB continue to extend the comment period to work out the concerns that the POU community has in order to implement AB 1594 as the legislature intended.

Sincerely,



Mandip Samra
General Manager, Burbank Water and Power

CC: The Honorable Liane Randolph, Chair, CARB
The Honorable Dr. Steve Cliff, Executive Director, CARB
The Honorable Caroline Menjivar, California State Senate
The Honorable Nick Schultz, California State Assembly