



April 17, 2026

Lauren Sanchez, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted via: https://carb.commentinput.com/?id=HBtS485cF&utm_medium=email&utm_source=govdelivery

Re: CalETC's Comments on the Proposed Amendments to the Advanced Clean Fleets Rule

Dear Chair Sanchez and Members of the Board:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide our comments on the Proposed Amendments to the Advanced Clean Fleets Rule (15-Day Changes). CalETC greatly appreciates CARB's work on this critical medium- and heavy-duty zero-emission truck regulation and your willingness to take feedback from stakeholders on critical issues.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the direction of CARB's 15-day Changes and recommends considering how to remedy the concerns raised by the Joint Public Agencies (JPAs) in their comments on the 15-Day Changes. CalETC strongly supports CARB's commitment to revisit the Advanced Clean Fleets Rule in 2027, and we recommend holding public workshops so public fleets, truck manufacturers, dealers, and others can share their experiences – both successes and challenges. CalETC also supports CARB's decision to delay the 100 percent ZEV purchase requirement from 2027 to 2030, which is a pragmatic change necessary to ensure compliance with and success of the rule.

The 15-day Changes made significant strides to fix some of the concerns raised by the JPAs, however, a few key barriers remain. CalETC recommends ensuring that the new language in section 2013.1 (f) does not restrict the use of exemptions when those purchases are covered by

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the 50% procurement requirement. This provision would create an unreasonable administrative burden for fleets and limit fleets' purchasing flexibility. Additionally, we recommend adding consideration of core specifications such as towing, payload, and off-road capabilities to the ZEV Purchase Exemption. These core specifications are critical for public utilities, especially smaller public utilities that need their vehicles to perform a wide range of duties in variable conditions and environments.

We greatly appreciate your dedication to transitioning the state's medium- and heavy-duty vehicle fleet to zero-emission and thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions at kristian@caletc.com.

Sincerely,



Kristian Corby
Deputy Executive Director
California Electric Transportation Coalition