

Truckee Donner Public Utility District (Steven Poncelet)

Please find the uploaded comments From Truckee Donner Public Utility District on the CARB April 2, 2026, 15-day Notice of Modified Text for the Advanced Clean Fleets regulation. TDPUD also supports the joint comments submitted by CMUA, NCPA, and SCPPA along with the comments submitted by ACWA regarding the negative impacts that the current regulation will have on the critical role electric, water, and wastewater utilities play in maintaining critical infrastructure and supporting emergency response.



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April 17, 2026 | Submitted electronically

Chair Lauren Sanchez
And Members of the California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Truckee Donner Public Utility District Comments to the April 2, 2026, 15-Day Changes to the Advanced Clean Fleets Regulation

Chair Sanchez and Members of the Board:

The Truckee Donner Public Utility District (TDPUD) appreciates the opportunity to submit comments on the California Air Resources Board's (CARB) April 2, 2026, 15-Day Notice of Modified Text (15-day changes) for the Advanced Clean Fleets (ACF) regulation. TDPUD has been directly engaged with CARB staff and Board since the beginning of this regulatory process and has consistently submitted written and verbal comments.

TDPUD also supports the previous and most recent comments from the Joint Public Agencies (California Municipal Utilities Association – CMUA, Northern California Power Agency – NCPA, and Southern California Public Power Authority – SCPA). CMUA, NCPA, and SCPA represent public electric, water, wastewater, and gas utility fleets and speak to our role in maintaining critical infrastructure and supporting emergency response.

TDPUD appreciates that the 15-day changes reflect some substantial changes to the ACF regulation in response to the concerns we raised in our previous comment letters and in subsequent productive discussions with CARB staff. At the same time, however, the 15-day changes introduce new barriers that undercut the ACF's intended flexibilities, and do not respond to several of the key outstanding issues raised by the TDPUD and CMUA, NCPA, and SCPA in prior comments. TDPUD supports CMUA, NCPA, and SCPA's request that CARB issue a second 15-day package to address these barriers for the successful implementation of the ACF.

In addition, the context in which this rule will be implemented continues to change, including shifts in federal policy affecting ZEV incentives, evolving manufacturer plans and product availability, and recent real-world emergency events that underscore the operational demands on utility fleets. TDPUD is well aware of the impacts of winter storm and wildfires on our community and the critical role the utility plays in quick outage restoration and supporting emergency response. The wildfires in LA in January 2025 should be a wake up for us all.

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Central to all TDPUD's comments is the critical importance of maintaining reliable, deployable specialty vehicles for emergency response, mutual aid, and service restoration. Despite some meaningful improvements reflected in the 15-day changes, those changes fail to reflect the fact that the ZEV market for utility vehicles continues to face significant uncertainty related to vehicle availability, delivery timelines, infrastructure readiness, availability of federal and state incentives, and vehicle performance across diverse and demanding operating conditions.

TDPUD again supports the comments submitted by CMUA, NCPA, and SCPPA but would like to highlight a few issues:

- AB 1594 (Garcia) passed almost unanimously through the Assembly and Senate and was signed into law by the Governor because the ACF regulation did not reflect and accommodate the unique role that electric, water, and wastewater utilities play in maintaining critical infrastructure and supporting emergency response. While AB 1594 was specific to the daily use exemption and end of life, the legislative intent was clearly for CARB to recognize and accommodate the unique role of the public utility and the Specialized Utility Vehicle.

The updated regulation claims to have fully addressed the intent of AB 1594 and proposes eliminating any distinction between Specialized Utility Vehicles/Utilities and the rest of the Public Fleets. TDPUD strongly suggests that CARB reconsider this as the proposed regulation does not meet the intent of AB 1594 and by eliminating Specialized Utility Vehicles from the ACF, everyone loses the opportunity to address the unique role of Specialized Utility Vehicles in a way that does not weaken the regulation for the vast majority of the fleet.

- TDPUD made early comments on the regulation to help CARB understand and accommodate the critical role of snow removal equipment in mountainous, snowy communities like Truckee. Up to the most recent 15-Day package, TDPUD was appreciative and satisfied with the snow removal provisions. However, the current regulation for snow removal exemption now includes a provision about approval subject to the CARB Executive Officers engineering expertise/opinion.

While TDPUD appreciates the dedication and acumen of CARB staff, the expectation that CARB staff have the expertise to understand the variety of snow removal equipment and operating conditions the TDPUD faces is not realistic. This concept of approval based on CARB staff's engineering expertise/opinion was added throughout the regulation and not likely to



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lead to an effective regulation. As suggested in previous comment letters, CARB should consider independent panels consisting of a cross-section of industry experts/stakeholders when engineering expertise and opinions are needed.

Public electric, water, and wastewater utilities work diligently to provide safe, reliable, and affordable services to the communities we serve. TDPUD supports the environmental goals of the ACF, but the current version will compromise critical infrastructure and emergency response, endanger the public, and significantly raise the cost of TDPUD's electric and water services. We appreciate CARB's attention to these concerns and remain available to work towards a successful regulation.

Regards,

Scott Crow

Acting General Manager

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cc: Brian Wright, TDPUD GM
Derek Dolfie, CMUA
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