San Francisco
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Services of the San Francisco Public Utilities Commission

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June 15, 2026

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

RE: Comments on Second 15-Day Changes to the Advanced Clean Fleets Regulation

Dear Chair Sanchez,

On behalf of the San Francisco Public Utilities Commission (SFPUC), I am writing to comment on the proposed amendments ("Second 15-day changes") to the California Air Resources Board (CARB) Advanced Clean Fleets (ACF) regulation, posted June 1, 2026. The SFPUC is highly concerned with the Second 15-day changes and requests CARB withdraw the proposed language and work with public utility fleets to better understand the operational and safety implications before implementing additional requirements.

The SFPUC, a department of the City and County of San Francisco, provides water, wastewater, and power services within the City and County of San Francisco and wholesale water to three Bay Area counties through the Hetch Hetchy Regional Water System. We are the third largest public utility in California, with infrastructure in seven counties, a $2 billion annual operating budget, and over $1.5 billion in capital projects planned annually for the next two years. The SFPUC's Power Enterprise operates two load serving entities: Hetch Hetchy Power, San Francisco's local publicly owned electric utility; and CleanPowerSF, San Francisco's Community Choice Aggregation (CCA) program.

In its current form, the ACF creates significant compliance challenges for the SFPUC and public utility fleets throughout the State which undermine our ability to provide essential services including first-responder capability and clean water and power. As a clean power provider, the SFPUC is supportive of efforts to transition fleets towards Zero-Emission Vehicles (ZEVs) and reduce carbon emissions. However, many of the medium- and heavy-duty (MHD) vehicles SFPUC relies on to provide critical public utility services, including wildfire mitigation and disaster response, are unavailable as ZEVs or near-ZEVs (NZEVs). Our service body trucks are required to carry heavy materials and specialized equipment that exceed the cargo capacities of ZEV alternatives. SFPUC relies on its fleet to operate in high fire threat remote areas where there is an absence of charging infrastructure and distribution system capacity to support a ZEV fleet. Battery life is a significant concern in this context as employees can potentially become stranded in high fire-threat zones. SFPUC is also obligated to respond in the aftermath of a major catastrophe, such as a major earthquake which would disrupt electrical infrastructure and our ability to charge ZEVs.

The Second 15-day changes create numerous additional challenges for public utility fleets, including that of the SFPUC. The changes expand the ACF to require public utilities, such as the SFPUC, to account for vehicles for which we contract with a private entity, as part of our fleet. As a result, the changes thereby establish a new responsibility for public fleets to ensure that contracted vehicles are compliant with the ACF. The SFPUC strongly opposes this change because it may require us to cancel or delay existing contracts which we currently rely on for essential utility infrastructure projects, maintenance, first-responder services, and the day-to-day delivery of clean water and power.

Additionally, some of the vehicles the SFPUC relies on are leased under limited, short-term contracts (e.g. less than 12 months). As such vehicles are only utilized temporarily and for limited durations, it is disingenuous to treat them as permanent assets in the SFPUC's fleet. For example, if the SFPUC contracts for 10 vehicles necessary to respond to an emergency situation or to complete a utility maintenance project over the course of 2 weeks, would the Second 15-Day changes would require us to add these vehicles to our fleet and purchase 10 additional ZEVs to offset these vehicles? This is both impractical and unsustainable and would create an unnecessary new cost burden for utility ratepayers.

The Second 15-day changes also create uncertainty regarding the scope of the new requirements. For example, it is unclear when either the First or Second 15-day changes will be in effect. It is also unclear whether the new language requiring public fleet operators to account for vehicles contracted for with a private entity also applies to contractors operating vehicles to perform work on our behalf. The SFPUC strongly opposes applying the regulation to contractors in this manner as it would undermine our ability to select compliant contractors, in particular, absent vehicles available on the market capable of both meeting CARB's requirements and our operational and safety needs. As the SFPUC and other public fleet operators attempt to comprehend and make good faith efforts to comply with the ACF, it is incumbent upon CARB to provide communication channels and resources to support our understanding and clarify increasingly complicated and evolving requirements and timelines.

As CARB considers this letter and the input of other essential service providers including public utilities and water agencies throughout the State, the SFPUC respectfully requests CARB consult and work with concerned parties to better understand the implications of proposed changes prior to effectively announcing new requirements. To that end, the SFPUC requests CARB work collaboratively with public utilities and water agencies in a subsequent rulemaking to develop the necessary refinements needed to ensure the regulation does not inhibit our collective ability to provide first-responder and essential public utility services, including clean power and water, to Californians.

Thank you for the opportunity to provide input on this matter. If you have any questions, please do not hesitate to contact Maisha Everhart, Manager of State and Federal Policy and Government Affairs, at (415) 407-1932 or meverhart@sfwater.org.

Sincerely,

Dennis J. Herrera
General Manager, SFPUC

cc: Members of the California Air Resources Board
Members of the San Francisco Delegation