



April 27, 2020

California Air Resources Board  
Transportation and Toxics Division Staff  
1001 I Street  
Sacramento, CA 95814

*Submitted via the electronic commenting system for the proposed TRU Regulation*

**RE: CARB's Proposed TRU Regulation**

The California Electric Transportation Coalition (CalETC) is pleased to provide these comments on the proposed Transport Refrigeration Unit (TRU) regulation. CalETC is a non-profit industry trade association that is committed to the successful introduction and large-scale deployment of all forms of electric transportation. CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalETC's board of directors include Los Angeles Department of Water and Power, Pacific Gas and Electric Company, Sacramento Municipal Utility District, San Diego Gas and Electric Company, Southern California Edison, Northern California Power Agency, and the Southern California Public Power Authority. Membership also includes manufacturers of zero-emission vehicles in all weight classes, electric vehicle charging station providers, and other industry leaders supporting transportation electrification (TE).

CalETC strongly supports the proposed TRU regulation and believes this regulation is an essential part of meeting the state's goals to reduce greenhouse gas emissions and improve air quality for all Californians. CalETC has some concerns with the utility reporting requirement in Section 2478.19 but believes that these concerns can be easily remedied. CalETC would like to thank California Air Resources Board (CARB) staff for their diligent work on this regulation and appreciate this opportunity to comment.

**I. CalETC Supports the Proposed TRU Regulation and Believes it will be Successful**

CalETC's members, including the utilities, infrastructure companies, and original equipment manufacturers, are prepared to meet the challenge of electrifying the TRUs operated in California. The utilities are prepared to meet the increased demand for electricity and conduct any necessary utility-side infrastructure upgrades. Utilities that have relevant make-ready programs are also prepared to help the applicable facilities with eligible customer-side upgrades, when possible. At this point, the utilities believe significant utility-side upgrades will not be necessary for a majority of the facilities to comply with the TRU regulation. While there will be facilities that have a significant

increase in electricity demand due to this regulation, in those cases, the utilities are prepared to work with the customers and the necessary regulatory agencies to accomplish the upgrades in an efficient and effective manner. CalETC and its members are excited about the opportunities and challenges presented by this regulation and we support the electrification of the state's TRUs.

**II. Section 2478.19 Should be Folded into Section 2478.14 so that Utilities can Work Directly with the Applicable Facilities and Streamline the Reporting Process**

Section 2478.19 of the proposed TRU regulation requires the utilities to report information to CARB that will be developed and provided to the utilities by the applicable facilities. CalETC believes the information requested in Section 2478.19 would be more efficiently and appropriately transmitted to CARB directly by the applicable facilities. Revising Section 2478.14 to include the information covered in Section 2478.19, which the facilities will develop as part of their application to their utility, will streamline the reporting process, prevent duplicative reporting, avoid privacy issues due to sharing customer information, allow the utilities to focus on providing quality service to their customers, and keep their customers informed regarding any utility-side upgrades. CalETC's members are dedicated to working with CARB and the applicable facilities to make this regulation a success and believe streamlining the reporting requirements is a step in the right direction.

Section 2478.19 is problematic and cumbersome because the utilities will need to seek out the information CARB is requesting from their customers. The projected increase in electricity demand required by installation of electric TRU (eTRU) infrastructure and whether the applicable facility will require a facility-side upgrade is information that the applicable facilities will need to develop as part of their plan to become eTRU ready. Outside of the CARB facility identification number, this information stems from an electrification strategy and timeline that utilities cannot complete on an applicable facility's behalf. Instead, applicable facilities must develop their own electrification strategy, timeline, and engineering design plan, often termed the "design package," with the assistance of its own electrical consultant. Once this design package is complete, the applicable facility submits the package to the utility. The utility will use the design package to confirm the design's parameters and analyze whether the utility-side infrastructure is sufficient in that area or whether an upgrade will be necessary. The utilities will not have the information listed in Section 2478.19 until the applicable facility submits its design package, and therefore, the utilities would need to request this information from its customers in order to comply with the TRU reporting requirement.

As currently written, the proposed regulation inadvertently creates an additional burdensome process step with the potential to slow reporting, create duplicative and potentially conflicting information, and divert utility service planning resources to tracking and re-packaging customer information to submit to CARB on the customer's behalf. This process will take away from the utilities' primary focus, which is to provide industry expertise and partnership with customers

seeking to enhance their electric vehicle and site electrification programs. Reporting customers' plans and actions to a regulator, as the utilities would be doing under the proposed requirement, will detract from the utility-customer partnership needed to achieve TRU objectives.

CalETC recommends removing Section 2478.19 and moving the requirements to report the projected increase in electricity demand and description of infrastructure upgrades, either utility- or facility-side, into Section 2478.14 as part of the applicable facility owner's Stationary Operating Time Limit (SOTL) Compliance Plan. This revision would be simple, as the SOTL already includes a description of the zero-emission fueling infrastructure at the site and any infrastructure that will need to be constructed, including the name of the fuel provider (i.e. the utility), and the number and types of connections. (See Section 2478.14(a)(3)(E-F).) Section 2478.14 also includes a requirement that the applicable facility provide a schedule for any infrastructure upgrades, including submission of permits and installation of charging or fueling infrastructure. (See Section 2478.14(a)(3)(F)(8).) The information from Section 2478.19 on electricity demand and infrastructure upgrades logically fits into these sections of the SOTL Compliance Plans. The applicable facilities will need to develop a design package that can be submitted to the utilities so that the utilities can determine, for each applicable facility, whether any utility-side upgrades are needed to meet the additional demand. The utilities are committed to provide the applicable facilities with documentation that describes any utility-side upgrades and an approximate timeline for when the upgrade can be expected to be completed. The applicable facilities can then include this documentation in the SOTL Compliance Plan. Additionally, if the applicable facility determines that it needs to seek an extension to comply with the TRU regulation, the utilities can provide information on utility-side upgrades for the extension applications under Section 2478.22. The utilities are committed to developing documentation that can be submitted to CARB for this purpose and will work with the applicable facilities and CARB to verify any information regarding the utility-side upgrades. Should there ever be any question as to the authenticity of an extension request, the utilities are committed to providing verification at CARB's request.

The SOTL Compliance Plans and the utility reporting requirement are both scheduled to be submitted on December 31, 2022. This is one year before all applicable infrastructure must be installed and six months before the extension applications are due. By combining the requirements in the SOTL Compliance Plan and the utility reporting requirement, CARB will have all the necessary information to evaluate infrastructure plans in one place. This will streamline the review process and increase coordination between the applicable facilities and the utilities, which is one of the most important parts of ensuring the success of this regulation. CalETC strongly recommends folding the utility reporting requirement in Section 2478.19 into the SOTL Compliance Plans.

The utilities are committed to working with applicable facilities and CARB to begin the process of preparing sites to achieve critical TRU emissions reductions. The utilities share CARB's interest in starting soon, so that any necessary site upgrade planning and implementation can begin promptly

and be processed efficiently. Building on existing processes and data submissions will help ensure that facilities, utilities, CARB, and other stakeholders reduce obstacles and enhance efficiency to achieve the regulation's objectives.

Thank you for your kind attention and consideration of these comments on the proposed TRU regulation. Should you have any questions, please contact Kristian C. Corby at [kristian@caletc.com](mailto:kristian@caletc.com) or 916-551-1943.

Sincerely,

California Electric Transportation Coalition

A handwritten signature in blue ink, appearing to read 'K.C. Corby', with a long horizontal flourish extending to the right.

Kristian C. Corby

Deputy Executive Director