

**December 9, 2019**

Craig Duehring  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**RE: Pacific Gas and Electric Comments in Response to the Air Resources Board's  
Proposed Advanced Clean Truck Regulation, Section 2012: Large Entity Reporting**

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to provide feedback in response to the Air Resources Board's (ARB) Proposed Advanced Clean Truck (ACT) Regulation as released for 45-day public comment on October 25, 2019. PG&E's comments are focused on the Large Entity Reporting requirement in Section 2012 of the proposed draft.

PG&E appreciates ARB's intent to collect information to assess the suitability of electric vehicles (EVs) across multiple business cases and to inform future strategies on how to accelerate the zero-emission vehicle (ZEV) market in California. However, PG&E remains concerned that the current draft reporting requirement is overly burdensome due to unclear scope and timing as well as underestimation of the costs and resources needed to gather this information. The following comments elaborate on these concerns.

*Clarify Scope and Timing*

According to the anticipated regulatory timeline, the ACT Regulation will not be approved by the Board until sometime in 2020. However, as currently drafted, the reporting regulation requires entities and fleets to gather the data in 2020 to report it in 2021. This timing leaves considerable uncertainty on when the regulation will be final and how much time entities will actually have to gather data.

PG&E also believes that the time necessary to gather the requested information will be considerably greater than estimated by ARB Staff, despite the slight increase in the ISOR analysis from prior cost estimates. Some of requested information is not data that PG&E already collects or has easy access to (such as the number of trips that third-party providers of various goods and services make to PG&E facilities, or if our vehicles commonly operate at their weight

limit). Designing an approach to procure this information, then actually collecting it and consolidating it into the format requested by ARB is more likely to take weeks of work.

The record retention requirements in Section 2012(e)(3) also stipulate that entities must maintain all individual fleet, vehicle, contract, and facility records used to compile responses until 2024. This implies that records must be *collected* for every facility, contract and vehicle even when grouping or representative facilities are allowed, thereby negating the time and resource savings that grouping information could provide.

PG&E is particularly concerned with the administrative burden for responding to Section 2012.3(b) which requires vehicle usage data for every facility where vehicles are domiciled. PG&E likely has hundreds of facilities that could fit this definition. PG&E strongly urges ARB to utilize data from a representative facility for each facility type, similar to Section 2012.2. This would significantly reduce the reporting burden and provide information that will be easier for ARB to analyze.

#### Conclusion

PG&E requests that ARB work with stakeholders on 15-day changes that clarify and narrow the timing and scope of the reporting requirement to address the concerns noted above. PG&E appreciates the opportunity to provide feedback on the proposed ACT regulation. Thank you for considering PG&E's comments and please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

Fariya Ali

Air & Climate Policy Manager

Pacific Gas & Electric