



November 13, 2020

Sent via email to LCFSworkshop@arb.ca.gov

Re: October 2020 workshop on Low Carbon Fuel Standard (LCFS) amendments

Dear CARB LCFS Team:

CalEETC appreciates this opportunity to comment on the October 2020 workshop on LCFS. We also appreciate the tremendous effort and accessibility of CARB staff on LCFS. CalEETC 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. CalEETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail.

Recommend increasing the accuracy of the EDU's estimated forklift credits and directing EDU's investment of LCFS credit value associated with forklifts. As adopted, estimated forklift credits prevent unclaimed electricity fuel credits in the forklift category and more accurately represent to carbon reduction associated with electric forklifts. CARB's current estimation methodology (using the CARB- CSU Fullerton low forklift population for CA) is not consistent with the population numbers (low, medium or high forecasts) by the California Energy Commission (CEC) or a report published by CalEETC using Industrial Truck Association (ITA) numbers.ⁱ CalEETC recommends CARB use the CARB-CSU Fullerton study's high forklift population for 2020 (100,994),ⁱⁱ which is conservative compared to the CEC's low-case e-forklift population (114,583) for 2020, and the ITA-ICF 2020 low-case forklift forecast (124,100).ⁱⁱⁱ We also recommend that CARB use the EPRI average kWh, which is conservative but more accurate than the low case.

In addition to more accurately representing the electricity fuel LCFS credits associated with electric forklifts, CalEETC recommends CARB provide direction in the regulation to the EDUs specifying priority investments using LCFS credit value generated by electric forklifts and the non-equity holdback portion of credit value from estimated base residential credits. .

Recommend flexibility on compliance with equity holdback spending requirements for EDUs in the regulation and guidance documents. CalEETC recommends allowing multi-year averaging or true-up period in the guidance document and in the regulation for the EDU's equity program reporting.

Recommend default EERs for TE end-uses. Specifically, CalEETC recommends default EERs for truck stop electrification, electric recreational boats, electric agricultural and mining equipment, electric sweepers/scrubbers, electric two tractors and other electric off-road equipment).

Recommend clarifying regulatory language on generating credits for e-motorcycles, e-bikes, e-cargo bikes, and neighborhood electric vehicles and accompanying EDU spending requirements. These TE end-uses help address equity issues.

Thank you for your consideration and CalETC looks forward to working with staff in the future on this important regulation.

Regards,



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California Electric Transportation Coalition

cc: Rajinder Sahota
Matt Botill
Rachel Conners
Jacob Englander

ⁱ CARB's commissioned study on forklifts by California State University (CSU) Fullerton available at https://ww3.arb.ca.gov/fuels/lcfs/electricity/ssrc_2017.pdf. California Energy Commission electric forklift population and kWh forecasts support the Integrated Energy Policy Report 2019 and are available upon request from the demand forecast staff at the CEC. The CalETC published study is available at https://caletc.com/assets/files/CalETC_TEA_Phase_1-FINAL_Updated_092014.pdf.

ⁱⁱ Instead of the low-case population of e-forklifts which we understand CARB currently uses.

ⁱⁱⁱ The low, medium and high-case forklift population numbers for the three reports are as follows:

CARB-CSU Fullerton: 52,901, 78,872, and 100,994

CEC's IEPR 2019: 114,583, 115,732, and 117,744

ICF Report for CalETC with ITA source data: 124,100, 129,800, and 135,600