



# PINESPIRE™

August 27, 2024

California Air Resources Board  
Low Carbon Fuel Standard Program

Re: Comments on Proposed Amendments to LCFS Regulation

PineSpire supports the strength of the proposed amendments to the regulation, including the strengthened CI standards, Auto-Acceleration mechanism, and overall efforts to improve the integrity of credit generation. We continue to support starting the auto-acceleration method sooner, in order to ensure the changes made in this rulemaking are meaningful in the near term as well as long term.

PineSpire offers the following specific comments on the proposed changes to how e-forklifts participate in the program:

### [Forklift Energy Economy Ratio \(EER\)](#)

CARB's updated proposal to modify the EER of forklifts is an improvement and provides a more consistent methodology. However, forklift capacity is not the best indicator of what forklifts were electrified prior to the baseline year of the regulation. The capacity of a forklift overlaps significantly across Class I, II, III, IV and V forklifts. PineSpire continues to recommend that rather than adjusting the Energy Economy Ratio, CARB phase out eligibility of Class III (pallet jack) forklifts, which were the primary electrified class prior to the baseline year. By phasing out Class III lifts, there is a reconciliation with the pre-regulation baseline while maintaining full incentives for electrification of the significant population of internal combustion forklifts still in California. Using forklift class is also an easier metric to report and to verify than forklift capacity. Alternatively, if CARB feels capacity is the best tool for defining EER adjustments, then PineSpire would recommend the capacity for the full EER is set at 3,000 lbs in order to continue to encourage conversion of all internal combustion forklifts in California.

### [Phase In of e-Forklift Metering Requirements](#)

We support the move to metering of forklifts and the newly proposed phase-in is a meaningful step towards feasibility. We appreciate CARBs receiving input from the industry in considering this issue. PineSpire does still recommend CARB extend the phase in period to mid 2026 or even 2027, due to the very significant number of meters that must be deployed throughout the state to meet this requirement. The tens of thousands of forklifts in California will require significant manufacturing, customer education, and resources for deployment. Based on experience in Oregon, a realistic timeline for achieving deployment at this scale is 18 to 24 months from when the regulation is passed.

Thank you for your consideration of our comments.  
Sincerely

Ryan Huggins, Partner  
PINESPIRE