



Fariya Ali 77 Beale Street, B29K
State Agency Relations San Francisco, CA 94105
(415) 973-8406
fariya.ali@pge.com

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

RE: Pacific Gas and Electric Comments on the Draft Transportation Refrigeration Unit Regulation

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment in support of the California Air Resources Board's (CARB) Draft Transportation Refrigeration Unit (TRU) Regulation, as provided on March 12, 2020.

1. Introduction

PG&E is committed to supporting the adoption of clean fuel vehicles in California to help the state meet its climate, air quality, and clean transportation goals. Transportation is the single largest source of climate-related pollution in the State and PG&E is supportive of CARB's efforts to reduce emissions from all transportation sectors, including TRUs. PG&E is ready to support the electrification of TRUs through our traditional service delivery process as well as through our specific EV program for medium- and heavy-duty EVs, EV Fleet. Compliance entities for this regulation could be eligible to participate in PG&E's EV Fleet program and could receive significant incentives and rebates to lower the cost of electrifying to meet the new regulation.

PG&E commends CARB staff for their work on this regulation and offers a few specific comments on the Proposed Utility Reporting Requirement in the following section, which are aligned with the comments and recommendations made by CalETC.

2. Specific Comments on the proposed Electric Utility Reporting Requirement

Electrification of TRUs will require collaboration of many parties including the facility owners and operators, the TRU owners and operators, Original Equipment Manufacturers (OEMs), and utilities. PG&E appreciates CARB's intent to proactively prepare for needed infrastructure to meet the regulation requirements through the Stationary Operating Time Limit Requirements (SOTL) compliance plans and the utility reporting requirements. Early indication of electrification plans can help PG&E begin the necessary work promptly and on an optimal

timeline. PG&E also appreciates the intent behind the information CARB is seeking to gather regarding an applicable facility, but suggests that the information requested in Section 2478.19(a)(1)(A-D) is best collected directly from the facility for the following reasons:

- The customer is responsible for providing the information in subparts A – C to PG&E in any electrical service upgrade application and would be able to report that directly to CARB.
- The customer receives information about the anticipated date of completion of necessary upgrade work from the utility through the application process and would be able to report that directly to CARB.
- The information is for compliance purposes and should be supplied to CARB by the regulated entity rather than another party (in this case, the utility).
- Providing this information for all applicable facilities, even if the facility does not end up seeking an extension or does not require a utility upgrade, would be resource intensive given the large number of applicable facilities in PG&E’s territory, and could divert utility resources from and delay other electrification projects.

As a preferred alternative, PG&E recommends that the information requested through the utility reporting requirement (Section 2478.19) be collected from facilities through their existing SOTL compliance plan requirement (Section 2478.14). This would streamline the reporting process, prevent duplicative reporting, and allow the utilities to focus on performing any necessary upgrades for these facilities. Additionally, the SOTL compliance plan and the utility reporting requirements are both scheduled to be submitted on December 31, 2022, and by combining the reporting into the SOTL compliance plan, CARB will have all the necessary information in one place.

While PG&E strongly recommends that the utility reporting requirements be removed and that the information be reported as part of the facilities’ SOTL compliance plans, PG&E is still very committed to working with customers to provide the information about the utility-side upgrades to customers for inclusion in their plans. To determine if any utility-side upgrades are needed to meet the additional demand from any electrification project, the applicant will need to develop and submit a design package with information on their electrification plans, including projected increases in electricity demand and planned facility-side upgrades. PG&E then reviews the application and informs the customer about any necessary upgrades and the estimated timeline. The applicable facilities can provide the documentation on any necessary utility-side upgrades associated with their eTRU projects, and the estimated timeline, to CARB as part of their SOTL compliance plan or for any potential extension request. PG&E is open to developing a standard template with this information that applicable facilities can provide to CARB, and will work with the applicable facilities and CARB to verify any information regarding utility-side upgrades.

This regulation is an important step in achieving critical TRU emissions reductions and PG&E believes these recommended revisions will streamline the process for CARB, the applicable facilities, and the utilities in order to more effectively achieve the goals of this regulation.

Conclusion

PG&E continues to support transportation electrification efforts that will help the state meet its aggressive climate and air pollution goals. PG&E appreciates CARB staff's responsiveness to stakeholder comments and looks forward to continuing to work with CARB on revising the proposed regulation for maximum efficiency and effectiveness.

Please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

Fariya Ali

Air & Climate Policy Manager

State Agency Relations

Pacific Gas and Electric