



June 5, 2024

**BY ONLINE SUBMITTAL**

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

ATTN: Steven S. Cliff, Ph.D., Executive Officer  
Keith Roderick, Air Resources Engineer, Staff Lead  
Leslie Goodbody, Staff ZEV Infrastructure Specialist

***Re: Comments on Proposed 15-day Changes to the Zero-Emission Forklift Regulation***

SCE supports a successful Zero Emission Forklift (ZEF) Regulation because it will help meet California’s ambitious air and climate goals by reducing greenhouse gas (GHG) emissions and improving air quality, particularly in communities disproportionately burdened with air pollution impacts.

Although SCE is preparing the grid for increased electric vehicle demand, there may be instances when additional time is needed to make necessary grid upgrades. Accordingly, SCE appreciates the inclusion of an “Infrastructure Site Electrification Delay Extension” within the draft ZEF Regulation, and that it is generally similar to the requirement in the Advanced Clean Fleets (ACF) Regulation.

The proposed Infrastructure Site Electrification Delay Extension includes one requirement that is of concern to SCE. Specifically, the draft ZEF regulation required the customer or fleet to provide “billing statements” from the electrical utility provider covering the previous 12-month period.”<sup>1</sup> The Proposed 15-Day Changes version modifies this requirement to mandate that the customer (fleet) provide “load profiles depicting the location’s typical electricity usage on an hourly basis from the electrical utility provider covering the previous 12-month period.”<sup>2</sup>

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<sup>1</sup> See Proposed 15-Day Changes, Attachment A-1, §3007.(b)(3)(B)(4)(a)(v), p. 50.

<sup>2</sup> *Id.*,

This requirement is unique to the proposed ZE Forklift Regulation. SCE wants to clarify that it will not be able to provide historical billing statements or load information that is relevant to a planned new account for EV charging equipment. Specifically, pursuant to Assembly Bill (AB) 841, the IOUs' EV Charging Infrastructure Rule (SCE's Rule 29) requires the installation of a separate meter for EV charging infrastructure. As such, no historical billing statements or usage information would be available for the new meter/account. If applicable, SCE could provide the customer with billing statements or usage information for other meter(s)/account(s) in their name at the location. However, this would likely reflect other use cases (e.g., lighting, office buildings, etc.), and it is unclear to SCE how unrelated billing and usage information would allow CARB to better understand the need for an Infrastructure Site Electrification Delay.

SCE respectfully requests that CARB eliminate the requirement for the customer to provide either historical billing or usage data in support of the Infrastructure Site Electrification Delay Extension. Removing this requirement will also increase consistency with the Advanced Clean Fleets regulation.

Thank you for considering our feedback regarding this important regulation.

Sincerely,

/s/ Rosalie Barcinas

Rosalie Barcinas  
Director, Electrification & Customer Services Policy  
Regulatory Affairs  
Southern California Edison