



Oregon Department of Environmental Quality

# Clean Fuels Program guidance for electric forklifts: Transition from estimation methodology to direct metering

## Background

In early 2023, DEQ adopted a transitional estimation method for electric forklift reporting to the Clean Fuels Program. In order to obtain the most accurate reporting for use of electricity in electric forklifts, that option expires with the Third Quarter 2023 report. This document outlines the process for transitioning electric forklift Fuel Supply Equipment (FSE) and reporting to only allow metered data for forklift reporting entities starting with the Fourth Quarter 2023 report. Although Third Quarter reports are not due until Jan. 10, 2024, reporting entities should begin the work now to identify which electric forklifts that you report for will be direct metered, or not, for Fourth Quarter reporting.

## What you should be doing now

Currently, forklifts must be registered to the facility where they are used, and the facility is registered as the FSE for those forklifts. As part of the transition to direct metering, the FSE registration for forklifts will change to the point where the forklift is being metered. DEQ will require re-registration of existing forklift FSE in the program. This will ensure that reporting is done at the appropriate level and allow DEQ to confirm where the meter is located.

## Upcoming deadlines and requirements

**Jan. 10, 2024** is the deadline to submit your Third Quarter 2023 (Q3) report. This is for all electric forklifts.

During this reporting period:

- Non-metered forklifts can still use the estimation methodology for reporting Q3 2023. After that, the estimation method can no longer be used.
- Reporting entities will submit to DEQ a list of electric forklifts or locations along with their respective Fuel Supply Equipment (FSE) identification that will be metered and those that won't.
- DEQ will deactivate all forklift FSE after the Q3 reporting deadline of Jan. 10, 2024 that are not metered.
- If you have an electric forklift FSE that started being metered during Q3 (July - September, 2023), follow the FSE registration process to re-register the FSE for the metered equipment; enter one transaction for the time prior to the installation of the meter using the estimation method; enter a separate transaction for the time after the meter was installed using the direct metered data. Please add the appropriate comment in the description column stating which transaction is estimation based and which one is metered, and for the metered transaction, include the old FSE ID in the transaction description.

**Feb. 15, 2024** is the deadline to submit all forklift FSE registrations and re-registrations for Q4 2023 reporting.

### Translation or other formats

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800-452-4011 | TTY: 711 | [deqinfo@deq.oregon.gov](mailto:deqinfo@deq.oregon.gov)

**March 31, 2024** is the deadline to submit Fourth Quarter (Q4) 2023 reports. Only direct metered electric forklifts will be able to generate credits.

- If a meter is installed partway through Q4, you may only report electricity when it was directly metered. No adjustments can be made to metered data unless it is to subtract charging going to a forklift being reported on by another party.
- All new forklift FSE registrations must identify the point where energy dispensed into the forklifts is being metered.
- For a new forklift FSE registration, the applicant must provide proof to DEQ that they are eligible to generate credits for a forklift by showing that they are the owner or operator of that forklift and proof that the forklifts are operational.
- The applicant must show how they are metering the energy dispensed into the forklift and that the metering equipment is operational. Some examples of what must be provided based on the point of metering are available in the table below. Please contact DEQ at [OregonCleanFuels@deq.oregon.gov](mailto:OregonCleanFuels@deq.oregon.gov) to discuss alternative options.
- If you are re-registering the forklift FSE with no changes in the forklift fleet, and you have successfully gone through the Call-In Process, then during the re-registration process you will only need to upload the up-to-date FSE Detail Sheet and demonstrate how you are metering the electricity dispensed into the forklift and that the metering equipment is operational.
- Successfully completing the call-in process confirms that:
  - DEQ received and accepted proof of your eligibility to generate credits for those forklifts
  - you are the owner or operator of the forklift
  - proof the forklifts are operational.

## Specific guidance for different meter locations

<b>Meter Location</b>	<b>Documentation that must be provided for FSE registration</b>	<b>Reporting instructions</b>
On the wall, circuit, or electrical panel	<p>When an electric meter is used to report forklift charging across multiple chargers or forklifts, the electric meter must be registered as the FSE.</p> <p>A single meter can be used for reporting for multiple chargers only if you can demonstrate that: (1) only forklift chargers are connected to the circuit or the panel at the time of registration, (2) steps have been taken to avoid connecting any other electrical equipment to that circuit or panel in the future, and (3) only forklifts you are the eligible credit generator for charge at the forklift chargers connected to the panel. In cases where you are not the credit generator for all of the forklifts at a given facility (for example, if there are also rental forklifts at the facility), you need to demonstrate you are only reporting charging for the forklifts for whom you are the credit generator. The registration materials must establish all three points and show that the metering equipment is operational.</p>	<p>Provide an updated FSE detail sheet in any quarter if the forklift fleet at the location changes.</p> <p>Report metered amounts without any adjustments, except if you need to subtract charging claimed by a rental forklift’s owner.</p>

<p>On the charger or charging cable</p>	<p>If the metering is on the charger or a charging cable, the charger must be registered as the FSE.</p> <p>Documentation must be provided if the charger tracks the amount charged into forklifts or forklift batteries – such as the user manual or other documentation for the charger -- and a written explanation of how the data is collected for quarterly reporting from the chargers at a given location.</p> <p>When a spreadsheet (such as a sample of the collected data from the forklift chargers at a location) is provided, a written explanation of the spreadsheet and how to interpret its data must also be provided. If you are not the credit generator for forklifts at a given facility, you must demonstrate that you are only reporting charging going to forklifts for which you are the credit generator.</p>	<p>Provide an updated FSE detail sheet in any quarter if the forklift fleet at the location changes.</p> <p>Report the metered amount without any adjustments, except if you need to subtract charging claimed by a rental forklift's owner.</p>
<p>On the forklift</p>	<p>If the meter being used for reporting is on the forklift, then the forklift must be registered as the FSE.</p> <p>Documentation must be provided if the amount charged is tracked by the forklift – such as the user manual or other documentation for the forklift – and a written explanation of how the data is collected for quarterly reporting from the chargers at a given location. When a spreadsheet (i.e., a sample of the collected data from the forklifts at a location) is provided, a written explanation of the spreadsheet and how to interpret its data must also be provided.</p>	<p>No FSE detail sheet is required if the forklift is registered as the FSE, however you must keep the FSE registration up to date, including if it moves between facilities. If there are changes to the location for the forklift, you must use the FSE Detail Sheet to note those changes and then upload that file as a supporting document to your quarterly report.</p>
<p>Telematics</p>	<p>If the meter used for reporting is on the forklift and connected to a telematics system, then the forklift must be registered as the FSE.</p> <p>Documentation must be provided if the amount charged is tracked by the forklift or the charger and uploaded into a telematics system. Documentation must be provided on company's/designator's letterhead to report forklift charging data is collected for quarterly reporting and that it is operational for registered forklifts.</p>	<p>No FSE detail sheet is required if the forklift is registered as the FSE, however you must keep the FSE registration up to date, including if the forklift moves between facilities. If there are changes to the location for the forklift, you must use the FSE Detail Sheet to note those changes and then upload that file as a supporting document to your quarterly report.</p>
<p>For rental forklift fleets</p>	<p>An owner of a rental forklift fleet, or more generally an owner of forklifts operated by others, must provide detailed data on their usage to accurately report the amount of electricity dispensed into them. If the data is available, the rental forklift must be register the rental forklift as the FSE.</p>	<p>An FSE Detail sheet must be provided each quarter that accounts for where the rental forklifts were located over the quarter. You must submit the FSE detail sheet by adding the FSE detail sheet as a supporting</p>

	<p>Registration needs to show how you are capturing metered charging data for the forklift(s) that you are reporting for similar to what is required above, and you are also expected to work with the forklift operators to ensure that there is no double-counting of forklift charging between the two of you. Under the new process you will register the forklift at the location where it is based for the rental fleet, not where it is operating at the time of the FSE registration.</p>	<p>document to your quarterly report.</p> <p>On an ongoing basis, you are responsible for working with companies that rent your forklifts and also report to the Clean Fuels Program to ensure that there is no double-counting of forklift charging.</p>
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All written explanations must be on the letterhead of the credit generator or designator and must include a signed and dated attestation. The declaration language is:

“I hereby declare that the information submitted here is true to the best of my knowledge and belief, and that I understand that this information will be used by Oregon DEQ for purposes of compliance with OAR Chapter 340 Division 253 and is subject to penalty for perjury.”

## Contact

Clean Fuels Program staff may be contacted at: [Oregoncleanfuels@deq.oregon.gov](mailto:Oregoncleanfuels@deq.oregon.gov)

## Non-discrimination statement

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