

June 6, 2023

Oregon Department of Environmental Quality
700 NE Multnomah Street, STE 600
Portland, OR 97232

RE: SRECTrade Comments in Response to May 30, 2023 workshop on reporting for electric forklifts under the CFP

Dear Department of Environmental Quality Staff,

Thank you for the opportunity to provide feedback in response to the May 30, 2023 workshop on reporting for electric forklifts under the CFP. SRECTrade has the following comments:

1. **DEQ should give more time for forklift credit generators to transition to metering equipment.** The current proposal would require forklift credit generators to design, procure, and install metering equipment in just a few weeks. While SRECTrade supports aligning forklift reporting with all other fuel types, the transition process must be thorough, informed, and transparent.

Although the current rule language provides DEQ with discretion in adopting an estimation methodology, such discretion has in effect already been exercised given that DEQ staff had *explicitly approved an estimation methodology as recently as the last reporting period*. Further, there is no record of any discussion of the matter during the extensive workshops and public comment process for the 2022 Program Expansion rulemaking. DEQ's proposal, which would have an abrupt and significant, negative impact on many participants, is not the result of a thorough, informed, or transparent process.

2. **Changes to the existing estimation methodology should be supported by data not perception.** During the workshop, DEQ staff repeatedly stated that there was no basis for reducing the depth of discharge from 80% to 20% aside from mitigating the potential for over-generation of forklift credits. While precision and accuracy are necessary for a successful program, DEQ should avoid making arbitrary changes based solely on the perception that current practices might overestimate GHG reduction. Instead, changes should only be informed by data and where possible, through informed participation from stakeholders.

SRECTrade appreciates the opportunity to provide feedback and looks forward to continuing to work with DEQ to ensure continued success of the CFP.

Sincerely,

Evan Rosenberg

Evan Rosenberg
Senior Manager, Business Development
SRECTrade, Inc.
(415) 651-7781
Evan.Rosenberg@SRECTrade.com

About SRECTrade

SRECTrade provides management and transaction solutions across a variety of renewable energy and clean fuel programs. The company is the largest third-party manager of EV charging assets under the California Low Carbon Fuel Standard. SRECTrade's parent company, Xpansiv, provides market infrastructure to rapidly scale the world's energy transition. Xpansiv operates CBL, the largest spot exchange for environmental commodities, including carbon credits and renewable energy certificates.