

## **Zero-Emission Forklift Regulation: Utility Provider Contact and Initial Reporting Requirements for State and Local Government Fleets**

This guide summarizes certain utility-contact and initial-reporting obligations applicable to state and local government fleets under the Zero-Emission Forklift (ZEF) Regulation, title 13, California Code of Regulations, sections 3000 through 3011. It is intended as a compliance aid only and does not expand, alter, or replace any regulatory requirement. In the event of any inconsistency, the regulation text controls.

### **Background**

State and local government fleets with covered Class IV or Class V large-spark-ignition (LSI) forklifts are subject to the Zero-Emission Forklift Regulation. Beginning January 1, 2026, fleet operators may not acquire or operate a Class IV or Class V LSI forklift, unless it is a 2025 model year or older forklift that has not been phased out. (See Section 3006 (d) for phase out schedules.) Under section 3006(d), model-year phase-out schedules begin in 2028 for certain Class IV forklifts in large fleets, in 2029 for certain Class IV forklifts in small fleets, and in 2030 for Class V forklifts.

### **Utility Provider Contact Requirement**

No later than March 31, 2026, the fleet operator must contact the applicable electric utility provider to initiate discussions regarding potential electrical-service installation or upgrades for each separately metered building or operating location with LSI forklifts subject to the phase-out requirements. If another entity is responsible for the electrical infrastructure at the operating location, that entity may contact the utility provider on the fleet's behalf.

At the time of contact, the fleet operator should provide, as applicable, the following information for each California location:

- the address of the location where the forklift(s) operate;
- the estimated number and types of chargers necessary to be installed each year to charge the ZEFs to comply with compliance dates for the fleet;
- if applicable, the power requirements of any infrastructure needed to be installed to fuel the ZEFs;
- information on alternate sources of power demand expected during the phase out period of the old LSI Forklift; and
- electrical load profiles showing clearly the location's typical electricity usage on an hourly, daily, and monthly basis.

Please note that the regulation may impose additional requirements beyond those summarized here. In the event of actual or apparent inconsistency between these staff instructions and the governing regulatory text, the regulation prevails. This guidance is not intended to be exhaustive and may not address every requirement that may apply in a particular circumstance.

### **Suggested Initial Outreach to Utility Provider**

A fleet operator may wish to use language substantially similar to the following:

We are evaluating replacement of covered large-spark-ignition forklifts with zero-emission forklifts at the following operating location(s): [insert address(es)]. Pursuant to title 13, California Code of Regulations, section 3006(c), we are providing the information currently available to initiate discussions regarding potential electrical-service installation or upgrades.

At this time, the fleet anticipates the following:

1. "Estimated charger deployment: [insert number and charger types by year]."
2. "Infrastructure requirements: [insert known charging and/or fueling requirements, if available]."
3. "Other anticipated power demand: [insert other known new loads during the relevant phase-out period]."
4. "Electrical load information: [attach hourly, daily, and monthly load profiles]."

Please advise: (i) whether existing service appears sufficient to support the anticipated ZEF charging and/or fueling load; (ii) whether panel, transformer, service, or other utility-side upgrades may be required; (iii) the anticipated process and lead times for any study, design, or upgrade work; and (iv) any additional information you require from the fleet. Please confirm receipt of this submission in writing.

### **Reporting to California Air Resources Board**

The utility-contact requirement is separate from the fleet's initial reporting obligation. For a large fleet, the initial report is due no later than **April 30, 2026**. For a small fleet, the initial report is due no later than **September 30, 2026**.

- For each separately metered building or operating location with LSI forklifts subject to the phase-out requirements, the initial report must include the copy of the information submitted to the applicable electric utility provider under section 3006(c).
- Fleets must include in their initial report either the utility's confirmation demonstrating receipt or other evidence that the section 3006(c) information was submitted to the utility.

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- If applicable, the initial report must also include if the existing panel capacity is expected to be sufficient or the date by which the existing panel capacity is expected to become insufficient to charge the ZEFs necessary to comply with the phase-out requirements.

Annual reporting thereafter includes updates regarding whether existing panel capacity is currently sufficient and, if applicable, the date by which existing panel capacity is expected to become insufficient.

CARB's January 2026 [Initial Reporting User Guide](#) states that fleets should use DOORS for initial reporting and should submit section 3006(c) documents via email to [zeforklifts@arb.ca.gov](mailto:zeforklifts@arb.ca.gov). The regulation separately provides that required reports and documentation are to be submitted electronically through a CARB reporting system or by email to that address.

### **Recommended Documentation Practices**

To preserve a clear compliance record, the fleet should retain:

- the exact materials transmitted to the utility provider;
- proof of transmission;
- any written confirmation of receipt;
- any written response from the utility provider;
- internal notes reflecting dates of contact, follow-up communications, and responsible personnel; and
- the final package submitted to CARB.

### **Additional Information**

Because CARB may update implementation materials, reporting instructions, advisories, and workshop notices from time to time, regulated parties should monitor the governing regulation itself, CARB's Zero-Emission Forklift program page, associated fact sheets and advisories, the program's meetings and workshops page, and the most current DOORS reporting guidance. For more information regarding LSI forklifts please see the regulation text: [Browse - California Code of Regulations](#).

Additional information can be found on the California Air Resources Board website at [Zero-Emission Forklift: State and Local Government Fleets | California Air Resources Board](#), or contact [zeforklifts@arb.ca.gov](mailto:zeforklifts@arb.ca.gov).

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