

PLUG IN AMERICA



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April 21, 2009

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Re: Comments on the Low Carbon Fuel Standard relating to Transportation Electrification

Dear Chairman Nichols,

We applaud the California Air Resources Board (CARB) for its work in developing the proposed Low Carbon Fuel Standard regulation that can spur the creation of a new generation of clean transportation fuels and is a critical component of the State's plan for meeting its 2020 greenhouse gas reduction goals under AB 32.

Plug In America strongly supports ARB's adoption of the Proposed Regulations to Implement the Low Carbon Fuel Standard (LCFS), dated March 5, 2009. We also recommend that the Board include the language described by the California Electric Transportation Coalition as additions to the Board Resolution to adopt the LCFS.

We agree with the broad coalition of groups who believe that electricity is the ultimate ultra-low carbon fuel. We also agree there are complex issues that need to be addressed to secure the very substantial greenhouse gas reductions from the use of electricity as a transportation fuel. As such, we recommend that CARB adopt the three proposed CALETC Board Resolutions which will allow for more time to work on these issues with stakeholders, including the California Public Utilities Commission (CPUC), and report back to CARB at its next hearing on the LCFS in December 2009.

Thank you for your work to make California a leader in reducing greenhouse gas emissions and air pollution, and for your consideration of these comments and recommendations.

Sincerely,

Jay Friedland
Legislative Director, Plug In America