

June 16, 2014



(Transmitted via email: mwaugh@arb.ca.gov)

Mr. Michael S. Waugh, Chief
Transportation Fuels Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on May 2014 Low Carbon Fuel Standard Workshop

Dear Mr. Waugh:

The California Electric Transportation Coalition (CalEETC) appreciates the opportunity to comment on the Low Carbon Fuels Standard (LCFS) May 2014 workshop. CalEETC is a non-profit association with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric and Southern California Edison.

First, we laud the California Air Resources Board (CARB) in the design and implementation of the LCFS. The regulation is designed to set a standard for the regulated industry and allow the industry to determine how best to meet that standard. This design has resulted in unanticipated innovation in both fuels and vehicles. Early implementation of the LCFS has demonstrated the effectiveness of the design in that the industry is over complying and credits are being generated from sources not originally anticipated during the development of the LCFS. CARB staff has meticulously considered all aspects of the regulation during this unfortunate legal delay and we appreciate the opportunity to provide some initial feedback.

CalEETC respectfully requests that the marginal electricity emissions factor (g/MJ) in the look-up table be updated to reflect a transition from 20% renewables in the current factor to a new factor that includes the required 33% renewables by 2021, and that look-up table also include appropriate values for 2017 and 2019 as part of this transition.

CalEETC appreciates the addition of forklifts and fixed guideway systems to the draft rule language. CalEETC has long advocated for this as the definition of transportation fuel in LCFS includes non-road uses of transportation fuel. CalEETC also looks forward to working with staff in 2015 and later years to add other types of non-road electric transportation to LCFS, as we have also requested this for many years, but realize the need to research various issues before developing rule language.

CalEETC will provide additional comments on additional subjects as the rulemaking process continues. We look forward to working with staff as this groundbreaking and essential regulation is re-adopted. Thank you for your consideration.

Regards

A handwritten signature in blue ink, appearing to read "Eileen Wenger Tutt".

Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition

EWT/kmg

cc: Manisha Singh (mansingh@arb.ca.gov)
Carolyn Lozo (clozo@arc.ca.gov)