



# Air Resources Board



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chairman**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

April 5, 2012

Ms. Eileen Wenger Tutt  
Executive Director  
California Electric Transportation Coalition  
1015 K Street, Suite 200  
Sacramento, California 95814

Dear Ms. Tutt:

In your letter dated January 31, 2012, you requested approval of an estimation methodology for reporting electricity transportation fuel pursuant to the requirements set forth in section 95484(c) of the Low Carbon Fuel Standard (LCFS) regulation. By this letter, your proposed methodology is approved for use in the 2012 reporting period, as described herein.

The California Electric Transportation Coalition (CaETC) has proposed using electricity consumption data from separately metered, including data from submeters, residential Plug-In Electric Vehicle (PEV) chargers (in kWhs) as a proxy for estimating non-separately metered PEV electricity consumption (e.g., those on whole house time-of-use or traditional domestic rates). To ensure that such estimations properly reflect market and regional trends, CaETC proposes that separately-metered PEV electricity consumption data be reported quarterly and that each utility provide such data specific to its service territory. If a utility does not have this capability, then CaETC proposes the utility use a statewide average of separately-metered PEV electricity consumption data.

To ensure robust estimates of the number of PEV customers and that credits are allocated to the correct utility, CaETC proposes obtaining zip+4 PEV registration data from a data management firm that has access to DMV data or other similar source(s). Using this information, utilities will be able to determine the number of PEVs within their service territory, and from that number use subtraction to determine the number of non-separately metered PEVs.

Each utility would submit the total PEV electricity consumption for their service territory (in kWhs) to the Air Resources Board (ARB) through the LCFS Reporting Tool. Each utility would submit any other supporting calculations in their annual LCFS reports, as required by the LCFS regulation.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

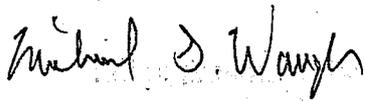
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The proposed method of reporting, described in your letter and summarized above, is substantially similar to the use of direct metering. Therefore, pursuant to Cal. Code Regs., tit. 17, § 95484(c), and ARB Executive Order No. P-12-001, this method is hereby approved for the 2012 reporting period. For subsequent reporting periods, separate approval requests must be submitted for our consideration. If you have any questions on this approval, please feel free to contact me at [mwaugh@arb.ca.gov](mailto:mwaugh@arb.ca.gov), or (916) 322-6020 or Ms. Manisha Singh, Manager, Fuels Section at [mansingh@arb.ca.gov](mailto:mansingh@arb.ca.gov), or (916) 327-1501.

Sincerely,



Michael S. Waugh, Chief  
Transportation Fuels Branch

cc: Manisha Singh, Manager  
Fuels Section  
Stationary Source Division