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February 22, 2018

SENT VIA ELETRONIC MAIL

Mr. Sam Wade
Chief, Transportation Fuels Branch
California Air Resources Board
Industrial Strategies Division
P.O. Box 2815
Sacramento, CA 95812

RE: Estimate for Energy Economy Ratios in Consideration of On-Road Electric Scooters and other Electric Vehicles

Dear Mr. Wade,

SRECTrade, Inc. is currently working with an electric vehicle fleet operator that provides an electric scooter share service for urban areas. The company provides lower emission transportation services through the use of shared electric scooters via a network and community of users. Scooter share participants contribute to lower emissions in the transportation sector by utilizing an electric transportation alternative for daily urban commuting and other transport needs.

Establish Estimate for Energy Economy Ratios (EERs)

In attempting to register our client's electric scooter fleet for participation in the LCFS program, we have been informed by California Air Resources Board Staff (Staff) that the current LCFS regulations do not have estimates for EERs for the class of electric vehicle operated in their fleet (i.e. electric scooter). Staff suggested we submit a comment letter recommending that the regulations consider this class of vehicle for participation in the LCFS program. Additionally, we would recommend that Staff, in consideration of current rule making changes underway, be given the ability to evaluate new vehicle types and easily apply EERs based on their research and approval without the need for a rule making change or adjustment. We make this suggestion such that new classes of vehicles and transportation to be developed and brought to market in the future could utilize the benefits of participating in the LCFS program without the need for lobbying for changes in the regulations. Staff would be able to easily evaluate the emission reducing merits of the vehicle or transportation type and determine if the technology would be eligible to participate in an efficient manner.

The vehicles under consideration are classified by the California Department of Motor Vehicles as CVC 406 (a). Each vehicle has an average range of approximately 15 miles per kilowatt hour of electricity.

Thank you very much for your time and consideration as you review these comments. We appreciate the opportunity to provide you with additional information about the specific vehicle types under evaluation.

Best Regards,

A handwritten signature in black ink that reads "Steven Eisenberg".

Steven Eisenberg / CEO / SRECTrade, Inc. / (415) 702-0863 / steven.eisenberg@srectrade.com