



September 1, 2017

Sam Wade – Branch Chief  
Transportation Fuels Branch, Industrial Strategies Division  
California Air Resources Board  
1001 I Street Sacramento, CA

RE: Low Carbon Fuel Standard 2018 Amendments

Dear Mr. Wade,

EVgo is an Electric Vehicle Service Provider that operates the largest publicly available Fast Charging network in the nation. EVgo covers 31 major metropolitan areas across the country with charging stations that serve all electric cars on the road today. We would like to thank CARB for the opportunity to comment on the 2018 LCFS Rulemaking and look forward to working with CARB for the duration of the process. There are three sections of the proposed rulemaking that will directly impact EVSP's ability to generate the maximum number of credits, responses detailed below.

***Section 4.e (Lookup Table Pathways)***

EVgo supports the plan to update the Lookup Table pathway for California grid electricity used to calculate credits for electric vehicle charging. As the California grid is comprised of a greater percentage of renewables each year, annual updates will more accurately reflect the CI of the grid while allowing for maximum credit production.

***Section 4.f (Renewable Electricity)***

There are two main avenues EVgo would like to propose as a renewable pathway for electricity supplied to EVs based on a 0 g/mi CI value. The first involves on-site generation from wind or solar. Allowing for on-site renewable generation would encourage renewable deployment while adding additional credits to the market. For many EV charging locations the deployment of on-site renewables is infeasible due to size constraints and other limiting factors. An alternative way to incentivize greater renewable deployment is to allow for non-located renewables. In this scenario, a credit generator would purchase the environmental attributes of 100% renewable electricity produced off-site either from solar, wind or a combination of the two. Environmental attributes from either RECs or green tariffs would be retired to ensure there is no double counting between LCFS and other programs. Together these methods would accommodate the variety of EV charging site configurations while greatly incentivizing the deployment of renewable assets.

***Section 5.c (Electricity Provisions)***

EVgo has specific concerns regarding requirements and expects to participate in the public process involving relevant agencies and stakeholders to finalize the Department of Food and Agriculture Division of Measurement Standards rulemaking. We plan to live by the terms of the agreement set forth in the ruling. Upon enactment of the regulation, there is particular need for

all LCFS credits to continue to be generated during allotted equipment upgrade periods. Doing otherwise could result in a reduction in LCFS credit generation while the equipment is upgraded, a situation we believe both CARB and EVgo would like to avoid.

EVgo appreciates the opportunity to comment on the 2018 Rulemaking and looks forward to our continued participation.

Best,

Kyra Hagl  
Market Strategy Analyst  
EVgo