From: Janelle London [mailto:janelle@coltura.org]
Sent: Monday, November 27, 2017 2:36 PM
To: Wade, Samuel@ARB <Samuel.Wade@arb.ca.gov>
Subject: Please make LCFS credits available to Community Choice Aggregations

Sam Wade
Fuels Division Manager California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Mr. Wade,

Coltura is a nonprofit working to phase out sales of new gasoline vehicles in California beginning in 2030. Phasing out gas vehicles is critical to meeting the greenhouse gas reduction goals of SB 32, and will improve California's air quality, public health, climate and economy.

Coltura appreciates the opportunity to submit comments on the California Air Resources Board's Pre-Rulemaking on Low Carbon Fuel Standard (LCFS). In particular, Coltura recommends that CARB give access to LCFS credits to Community Choice Aggregations (CCAs).

To smooth the transition away from gas vehicles, measures must be taken in the interim to increase electric vehicle (EV) adoption as much as possible. To make those measures most effective in reducing greenhouse gas emissions, they should target those EV drivers who are getting or will get their electricity from the cleanest sources. Giving CCAs access to LCFS credits helps achieve both of these goals.

As Sonoma Clean Power's EV incentives pilot program has shown, aggregating financial incentives and making them available to customers at the dealership increases the likelihood of EV purchase or lease. Adding LCFS credits to the bundle of incentives that CCAs can offer at the time of purchase/lease will further sweeten the deal and motivate the desired outcome: getting more people into EVs.

When those who purchase/lease EVs are CCA customers, they are also charging their EVs with cleaner generation sources like Peninsula Clean Energy's ECOplus (80% GHG free) and ECO100 (100% GHG free), and supporting on-site generation of renewables and other CCA renewable energy programs.

Simply put, giving CCAs access to LCFS credits enables California to get more people into EVs that run on cleaner electricity.

Accordingly, we agree with and support the recommendations proposed by the Smart EV Charging Group, and in particular the following statement from their comments submitted October 6, 2017:

Allowing the generation of credits by Community Choice Energy Providers and Fuel Reporting Entities within Community Choice Energy Providers' customer portfolios to generate incremental credits due to a Community

Choice Energy Providers' lower carbon portfolio will spur incremental adoption and investment in transportation electrification by multiple parties in the EV ecosystem. The Smart EV Charging Group recommends that the LCFS recognize through credit generation the incremental low-CI procurement by Community Choice Energy Providers that opt-in to participate in LCFS. In doing so, the ARB would not disrupt existing EDU credit generation or the CPUC-approved EV rebate programs that currently apply to bundled or unbundled customers. These changes would enable Community Choice Energy Providers to receive credit for aggressive, low-CI procurement and support existing and future CCA EV programs (such as those of Sonoma Clean Power described in Appendix 3).

Coltura is grateful to CARB for its leadership on this important matter, and for helping enable California to lead the country in the transition away from gas vehicles to EVs powered by electricity generated from clean, renewable sources.

Sincerely,

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It's time to phase out gas vehicles – see Op Eds here and here.