

August 8, 2022



Cheryl Laskowski
Chief, Transportation Fuels Branch Strategies Division
California Air Resources Board

RE: Improvements to LCFS Data Management Systems

Dear Ms. Laskowski,

In coordination with a variety of program stakeholders, SRECTrade and the signatories below respectfully submit the following comments requesting the California Air Resources Board (CARB) to hold a public workshop to solicit feedback on the LCFS Reporting Tool and Credit Bank & Transfer System (LRT-CBTS).

The LRT-CBTS is the software backbone for one of the largest and most effective compliance programs in the world, serving as the singular interface for all regulated participants, verifiers, and CARB staff. The tool was first deployed over a decade ago and has since undergone very limited improvements. Meanwhile, the LCFS program has grown tremendously. Today there are over 500 registered users, with many hundreds of thousands of registered fueling assets, logging millions of distinct fuel transactions every quarter, all manually reported into the LRT-CBTS. This system is also used to settle credit transfers - there have been over 10,000 since the program's inception with a current pace of over 3,000 transfers per year.

As major changes to the LCFS program itself are now being considered, CARB staff should similarly evaluate the effectiveness of the underlying data management systems that are so critical to its implementation and explore making improvements such as developing an application programming interface (API) to enable third-party tools to interact with the LRT-CBTS.

We, the users and beneficiaries of these very systems, respectfully request that staff hold a pre-rulemaking workshop this year to address improvements to the LRT-CBTS, and specifically solicit stakeholder feedback on the benefits and feasibility of developing an API.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Saxton".

Michael Saxton
Managing Director, Clean Transportation
SRECTrade, Inc.
(816) 210-9669

In support of the comments submitted by SRECTrade, Inc., requesting CARB staff to solicit feedback on the LCFS Reporting Tool and Credit Bank & Transfer System during a pre-rulemaking workshop this year.

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