ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

January 7, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: December 7, 2021 Public Workshop on Potential Future Changes to the LCFS Program

ChargePoint appreciates the work the California Air Resources Board (CARB) does developing, amending, and managing the Low Carbon Fuel Standard (LCFS) and the opportunity to participate in the public feedback process. ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and transport fleets of all types. Today, one ChargePoint account provides access to hundreds of thousands of places to charge in North America and Europe. ChargePoint is a participant under the California and Oregon LCFS programs and has collaborated in LCFS rulemakings in Washington, Oregon, British Columbia, Canada, and Germany.

ChargePoint would like to provide the following comments in response to the potential future changes to the LCFS raised by CARB in the December 7 Public Workshop.

Incentivize investment and align with long-term climate goals

ChargePoint supports CARB's goal of incentivizing investment and aligning with California's long-term climate goals. To achieve this goal, no single amendment to the LCFS will do more to further these goals than accelerating the pre-2030 carbon intensity (CI) target and strengthening and extending the post-2030 target. To date, the LCFS has proven extremely successful at incentivizing innovation and investment in low carbon transportation fuels: the amount of non-ethanol low-carbon fuel delivered to California's transportation fuel market has increased by nearly 2,000% since 2011 (electricity as a transportation fuel has increased by over 150,000% under the LCFS)[1] and when factoring in the supply pipeline, California is well on its way to achieving the 2030 CI target under the program. As a result, many market participants now have a bearish sentiment on future credit prices which stifles marginal investment in low-carbon fuel and additional emissions reductions. In the case of electric vehicle (EV) charging, near term investments are critical to continue the expansion of charging infrastructure and accommodate the rapid growth of both personal and commercial EVs, particularly trucks and SUVs. By amending and accelerating the pre-2030 CI target and strengthening and extending the post-2030 target, CARB could better align the LCFS targets with California's long-term climate goals and create the investor confidence needed to incentivize the next wave of investment and move California closer to its mid-century net-neutrality goal. If CARB is unable to immediately amend the CI schedule, signaling its intent to do so would improve investor sentiment and bring more low-carbon fuel and infrastructure to market.

Accelerate transition to ZEVs

As it relates to leveraging the LCFS to accelerate the transition to zero emissions vehicles (ZEVs), if CARB is considering extending the hydrogen refueling infrastructure (HRI) crediting provision to

[1] CARB LCFS data dashboard, LCFS fuel volume growth 2011-current

medium and heavy-duty vehicles (M/HDV) then CARB should extend the fast-charging infrastructure (FCI) provision to M/HDV as well. Electrification in the M/HDV segment is happening and as production scales and more vehicle models become available there will be a need for non-depot charging infrastructure to serve these fleets and mitigate fleet owners' risk of stranding vehicles in-route. The FCI provisions currently in place for light duty vehicles (LDV) have proven very effective at de-risking and attracting significant investment in LDV direct current fast charging (DCFC) and the same can be expected for M/HDV. ChargePoint also supports exploring how to incentivize more investment in battery storage under the LCFS and while we do not have specific proposals to lay out at this time, we support holding technical workshops and gathering more stakeholder feedback to inform potential mechanisms

Along with extending the FCI provisions to M/HDV, CARB could help accelerate the transition to ZEVs under the LCFS by exploring ways of increasing the rebate amount under the Clean Fuels Reward program so that the value received by drivers is a higher percent of the average lifetime value of a single EV under the program. For example, assuming a passenger EV driver charges roughly 750 kWh per quarter at home, the statewide electricity CI declines at a modest rate of 3% per year, and credit prices start at $145 and slowly decline thereafter, the 10-year lifetime value of the residential base credits equals approximately $3,000. At $750, the Clean Fuels Reward rebate makes up only a quarter of this value. Acknowledging that credit prices fluctuate and may decline faster and cashflows must be sustained, we would encourage CARB to explore ways, potentially through a partner such as a green bank, of increasing the rebate amount to drivers so as to more accurately reflect the lifetime value of home charging under the program. This should help accelerate EV adoption and gasoline displacement in the state.

Finally, we propose that CARB recategorize "multi-family" charging as non-residential under the LCFS to amplify the incentive for multi-family apartment developers to install charging infrastructure at multi-family home properties. This would give multi-family apartment developers more agency in the ability to recoup infrastructure costs and should accelerate investment in the segment. Residences of multi-family apartments would still be eligible for the Clean Fuels Reward and would be more likely to have access to home charging, increasing the likelihood these drivers will switch to electric. This small change to the program may also go a long way in helping transportation network companies to electrify, as mandated under the California Clean Miles Standard.

Streamline implementation and enhance exportability

ChargePoint is active across several North American coalitions to help stand up LCFS programs and we appreciate CARB lending its learnings and support to these jurisdictions.

We would express initial support for CARB to develop a single CI benchmark table for primary obligated and opt-in fuels under an LCFS to ease the lifecycle assessment burden on outside jurisdictions. This may be of particular use to smaller states considering adopting the LCFS. In doing so, CARB could consider making the model assumptions behind each CI calculation transparent and easy to adjust in case other jurisdictions see fit to make changes that may better reflect local emissions factors.

Thank you for considering our feedback. We look forward to continuing to participate in the public feedback process.

Evan Neyland

Evan Neyland
Clean Fuels Manager