



SRECTrade

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January 7, 2022

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

Dear Ms. Laskowski,

SRECTrade is a technology driven management platform and transaction services firm that helps provide equitable access to complex environmental commodity markets. As the largest third-party manager of EV LCFS credit generating assets in California, we facilitate participation in the market for a variety of public and private clean transportation asset owners across multiple industries and sectors.

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) Staff to evaluate the implementation of an Application Programming Interface (API) for the LCFS Reporting Tool and Credit Bank and Transfer System (LRT-CBTS).

The LRT-CBTS has been an effective tool for the first decade of the program – enabling program registrants to manage compliance and trading activities and CARB staff to monitor and enforce regulatory requirements. Through the life of the LCFS program, user interfaces have been marginally improved, but are still highly limited in terms of functionality and ease-of-use. As staff considers major changes that will align the LCFS program with the 2022 Scoping Plan Update, now is the best time to evaluate opportunities to modernize the technology that underpins the LCFS program.

The current state of the LRT-CBTS will impede future program success. The LRT-CBTS is the only platform where program participants interact with the LCFS program – managing credit and deficit balances; submitting pathway reports, fuel transactions, and verification statements; registering facilities and assets; and formalizing credit transactions. As the program continues to expand and evolve, users will be managing an increasing myriad of such tasks using only manual input and spreadsheet uploads. This continues to be labor intensive, costly, and error prone for both users and CARB staff reviewers.

We would like to re-introduce the concept of implementing an Application Programmable Interface (API) for the LRT-CBTS. An API is essentially a software intermediary that allows two applications to talk to each other. In the case of LCFS, third-party developers would be able to build software tools that interact with the LRT-CBTS in the same way that a current user does through a user interface, but with the efficiency and capability of computer software. APIs do not affect the underlying user permissions or introduce additional functions but instead enhance interactivity between the system and its users.

At a minimum, an API would increase the efficiency and accuracy by which users and CARB Staff collectively perform the same tasks today. Additionally, APIs can increase user security by allowing the deployment of two factor authentication services on top of the LRT-CBTS. APIs can help enable greater accessibility to the CA LCFS market by being open and accessible to any and all market participants. Once an API for the LRT-CBTS has been developed, these additional gains in efficiency and user experience provide benefit to the private sector and CARB staff, while the costs are borne solely by those developing to the API.

The use of APIs is not new to environmental commodity programs. The New England Power Pool Generation Information System (NEPOOL GIS) and PJM's Generation Attribute Tracking Systems (GATS) currently have APIs in place that are widely used as an acceptable means of data transfer. The benefits of APIs in these programs could be shared by the LCFS program and participating community. We believe that these benefits would spur innovation and increase LCFS program participation and program success.

We recommend that Staff consider implementing an API as a means of further streamlining how users manage their regulatory responsibilities and engage with the LCFS program and marketplace. This implementation would enable third-party innovation to improve user experience and induce more positive program outcomes. These changes can benefit the program today, while greater Scoping Plan Update and LCFS Program changes are being considered and developed.

Thank you very much for your time and consideration as you review these comments. SRECTrade and the signatories below welcome the opportunity to further discuss this concept and support CARB staff efforts in any way we can.

Best Regards,



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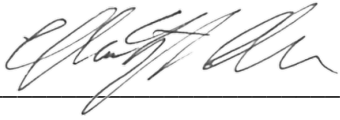
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In support of the comments submitted by SRECTrade, Inc.

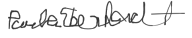
Signature:



Name: Chris Andrichak
Title: CFO
Company: Alameda-Contra Costa Transit District

In support of the comments submitted by SRECTrade, Inc.

Signature:



Name: Paula Eberhardt

Title: Director of Finance

Company: Anaheim Transportation

In support of the comments submitted by SRECTrade, Inc.

Signature:

Alex Pado

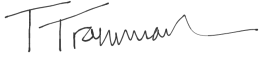
Name: Alex Pado

Title: Analyst

Company: DGS

In support of the comments submitted by SRECTrade, Inc.

Signature:

A handwritten signature in black ink, appearing to read "T Trauman", with a horizontal line extending to the right.

Name: Todd Trauman

Title: CEO

Company: e-Mission Control, Inc.

In support of the comments submitted by SRECTrade, Inc.

Signature:

Richard L. Tree

Name: Richard Tree

Title: Transit Manager

Company: City of Porterville

In support of the comments submitted by SRECTrade, Inc.

Signature:

David Dunn

Name: David Dunn

Title: Renewables Manager

Company: IAC

In support of the comments submitted by SRECTrade, Inc.

Signature:



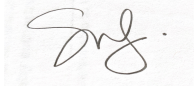
Name: Patrick Macdonald-King

Title: COO

Company: EV Connect, Inc.

In support of the comments submitted by SRECTrade, Inc.

Signature:

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Name: Shannon Parry

Title: Chief Sustainability Officer

Company: City of Santa Monica

In support of the comments submitted by SRECTrade, Inc.

Signature:

Rick Ruvo


Name: Rick Ruvo

Title: Board Member

Company: East Bay Clean Cities Coalition

In support of the comments submitted by SRECTrade, Inc.

Signature:



Name: HARRISON CLAY

Title: Head of Biogoas

Company: Mercuria

In support of the comments submitted by SRECTrade, Inc.

Signature:

Mike McLellan

Name: Michael McLellan

Title: Utility Program Coordinator

Company: Moreno Valley Electric Utility

In support of the comments submitted by SRECTrade, Inc.

Signature:

Jan Pepper

Name: Jan Pepper

Title: CEO

Company: Peninsula Clean Energy

In support of the comments submitted by SRECTrade, Inc.

Signature:

Bryan Towe

Name: Bryan Towe

Title: Vice President, Finance

Company: Powerflex Systems

In support of the comments submitted by SRECTrade, Inc.

Signature:

Parker Chase

Name: Parker Chase

Title: Director of Supply and Logistics

Company: Propel Fuels

In support of the comments submitted by SRECTrade, Inc.

Signature:

Michael E Thompson

Name: Michael E Thompson

Title: Director, FP&A

Company: San Diego Metropolitan Transit System

In support of the comments submitted by SRECTrade, Inc.

Signature:

A handwritten signature in cursive script, appearing to read "Chuck Farmer". The signature is written in dark ink and is positioned above a horizontal line.

Name: Chuck Farmer

Title: CFO

Company: Santa Cruz Metro

In support of the comments submitted by SRECTrade, Inc.

Signature:

A handwritten signature in black ink, appearing to read "Andrew Karetsky", followed by a horizontal line.

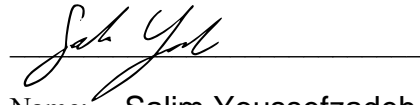
Name: Andrew Karetsky

Title: President

Company: Skyview Ventures

In support of the comments submitted by SRECTrade, Inc.

Signature:

A handwritten signature in black ink, appearing to read "Salim Youssefzadeh", is written over a horizontal line.

Name: Salim Youssefzadeh

Title: CEO

Company: WattEV

In support of the comments submitted by SRECTrade, Inc.

Signature:

A handwritten signature in black ink, appearing to read 'B. Trowbridge', positioned above a horizontal line.

Name: Bonnie Trowbridge

Title: Director of Policy & Communications

Company: Zeem Solutions