



ChargePoint, Inc.

240 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

April 23, 2018

Sam Wade
Branch Chief, Transportation Fuels
California Air Resources Board
1000 I Street
Sacramento, CA 95814

RE: CHARGEPOINT COMMENTS ON THE LOW CARBON FUEL STANDARD 2018 PROPOSED
REGULATION ORDER

Dear Mr. Sam Wade,

ChargePoint respectfully submits these comments in regards to the California Air Resources Board (ARB) Low Carbon Fuel Standard (LCFS) 2018 Proposed Regulation Order. Given Governor Brown's Executive Order B-48-18, which aims to have 250,000 electric vehicle chargers installed by 2025 and 5 million zero emission vehicles (ZEVs) on the road by 2030, enhancements and amendments to the LCFS Program in this rulemaking cycle are critical to reach the State's ambitious goals.

ChargePoint is the leading electric vehicle (EV) charging network in the world, with charging solutions in every category EV drivers charge, at home, work, around town and on the road. With more than 47,000 independently owned public and semi-public charging spots and thousands of customers (businesses, cities, agencies and service providers), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every use case. Leading EV hardware makers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 36 million charging sessions, saving upwards of 36 million gallons of gasoline and driving more than 868 million gas-free miles.

ChargePoint strongly supports the inclusion of Book-and-Claim/Indirect Accounting for Renewable Electricity in this rulemaking cycle. This mechanism will help meet the ambitious carbon reduction targets established in Assembly Bill 32, the California Global Warming Solutions Act of 2006, as well as subsequent amendments and re-adoptions of the Program. In fact, [Cerulogy's "California's Clean Fuel Future" report](#) estimated that the addition of the "renewable and/or 'smart' charging" pathways "could deliver an additional 1% to 1.5% carbon intensity reduction."

While ChargePoint commends the Air Resources Board for broadening opportunities within residential EV charging, we recommend establishing a hierarchy specifically for the incremental credits section. Prioritizing "EV Charging – Grid" over "EV Charging – Non-Grid" would best meet the primary goal of the Program, to focus on alternative fuels, by decreasing the carbon intensity of transportation fuels and providing more low-carbon and renewable alternatives. Allowing for telematics, while not explicitly referenced in the regulation, to be able to meter EV charging, helps incentivize electric vehicles, not



necessarily the fuel that powers the vehicles. While incentives for electric vehicles are still critical at this stage of adoption, this is the one state program that focuses on alternative fuels, while there are other vehicle incentive programs, such as the Clean Vehicle Rebate Project (CVRP). Automakers have the ability to register vehicles at "point of sale" (or lease), while home chargers are typically purchased after the fact, and therefore would nearly default to being a vehicle program. Not to mention that verification and concerns of double-counting are much less of an issue through "EV Charging – Grid" versus geo-fencing which is more difficult to substantiate. Additionally, while it makes sense from an equity standpoint to provide equal access to LCFS credits for both single-family homes and multi-family homes, multi-family charging can often be located in the "visitor" or "mixed-use" area of a multi-family residence, which is closer to "non-residential" in the usage. This could be an area of significant verification confusion if vehicles can register credits for chargers with multiple users, including non-residents. ChargePoint recommends removing multi-family from the residential section, or adding language that requires separating non-residential and residential (deeded/dedicated parking) EV charging at multi-family sites. We support Staff's recommendation to allocate incremental credits for residential EV charging based on the carbon intensity of load-serving entities. In addition, we recommend that the residential base credits be allocated to the entity serving that customer's load.

Lastly, given the changes proposed in this rulemaking cycle to the electricity portion of the LCFS program, ChargePoint recommends that ARB develop a streamlined data collection system. With thousands of chargers currently registered in the program, as well as a proposed Time-of-Use (TOU) program that would require hourly data reporting, the current system of emailing Excel files as back-up verification data is neither secure nor efficient.

ChargePoint appreciates the opportunity to submit these comments and looks forward to continuing to work with the Air Resources Board, as well as other stakeholders, on continuing carbon emission reductions associated with alternative fuels through the Low Carbon Fuel Standard Program.

Sincerely,

A handwritten signature in cursive script that reads "Amanda J. Myers".

Amanda Myers
Public Policy Manager
ChargePoint, Inc.