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Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Low Carbon Fuel Standard Program Amendments for Regulated Parties for Suppliers of Electricity Used as a Fuel Substitute.**

Dear Madam or Sir:

NRG EVgo ("EVgo") appreciates the opportunity to review and comment on the referenced amendments to the Low Carbon Fuel Standard Program as they affect suppliers of electricity used as a fuel supplement.

EVgo is a leading Electric Vehicle Services Provider ("EVSP") in the state of California seeking to grow the market for the future of California's EV drivers and the environment. EVgo has a multi-faceted business model engaged in expanding both private and public access EV charging infrastructure throughout California. As a company heavily engaged in the development of EV charging infrastructure, we believe the LCFS credit program can be beneficial to the continued expansion of our business operations and the growth of the EV market in California. The proposed amendments restrict the ability of EVSPs to generate credits to public access charging alone, which unnecessarily constrains incentives for EVSPs in expanding charging opportunities at multifamily dwellings and workplaces. The success of the EVSP industry hinges on the viability of a complete ecosystem of EV charging products covering: home, public access, workplace, and multifamily. EVgo would like to see the California Air Resources Board maximize credit generating opportunities for EVSPs across all public and private access chargers.

EVgo aims to enroll in the LCFS program shortly and looks forward to working closely with the California Air Resources Board to maximize EV adoption.

**Generally, EVgo objects to the elimination of the general category "electricity services supplier" as a regulated party eligible for the full suite of credit generation opportunities.**

The policy objectives supporting the use of electricity in the LCFS should incentivize all market participants to increase electrification and reduce carbon intensity. Restricting certain categories

of LCFS eligibility to Electrical Distribution Utilities creates a skewed playing field that unfairly favors utilities over private market participants such as EVSPs.

**EVgo respectfully objects to the proposed language of § 95483(e)(1) for failing to include EVSPs as an eligible regulated party at single- or multi-family residences.**

Expanding EV charging into multi-family residences is a critical component of EV adoption in California. EVgo's business model includes contracting with apartment communities to provide turnkey charging services to its residents. The ability to generate credits through these relationships would provide a significant incentive to increasing deployment. Owners of multi-family residences have generally been hesitant to invest in EV infrastructure and manage the authentication, networking, maintenance and billing activities needed to serve residents. Permitting EVSPs to generate credits through the provision of private access residential charging services would encourage further development and lead to more opportunities for EV drivers to charge their vehicles during off-peak hours.

EVgo requests that § 95483(e)(1) be amended to include verbiage similar to § 95483(e)(2) or § 95483(e)(4) (assuming "site host" would include EVSPs) such that EVSPs who have contractual relationships with property owners or managers to provide charging services are permitted to generate credits at single- and multi-family residences.

**EVgo respectfully supports the proposed language of § 95483(e)(2) including EVSPs as an eligible regulated party at public access EV charging stations.**

EVgo is investing heavily in public access EV charging stations across the state of California. Generating credits through the LCFS will enable us to expand our offerings and increase the pace of deployment. Additionally, the public education requirements align closely with many of EVgo's current programs and its ultimate business objectives.

**EVgo respectfully requests clarification of the term "Site Host" in § 95483(e)(4) to include EVSPs in connection with business and workplace charging.**

Workplace charging is an essential component of EV adoption in California. EVgo welcomes the opportunity to generate credits as the EVSP of private access charging stations at a business or workplace. The term "site host" should be clarified to include EVSPs who have contractual relationships with a business or property owner to provide charging services.