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From: **Lisa McGhee** <[lisa@greenpowermotor.com](mailto:lisa@greenpowermotor.com)>  
Date: Sun, Nov 13, 2022 at 7:37 PM  
Subject: LCFS Modeling Transparency to support & prepare comments due 12-12-22  
To: <[gotomeeting7@arb.ca.gov](mailto:gotomeeting7@arb.ca.gov)>

[Compilation of comments for lcfs-wkshp-nov22-ws](https://www.arb.ca.gov/lispub/comm2/iframe_bccommprt.php?listname=lcfs-wkshp-nov22-ws)

I am requesting detailed answers to the information that the Staff has not made available to the public to support providing comments, see below.    
  
Please provide answers to the following:  
 **1) LCFS 2010-2045 CI Benchmark for each scenario A-C as shown on pp 24-26 in your presentation.**  
> 2030, 2035, and 2040 are illustrated in your scenarios; however, on page 26 you state a 90% reduction by the year 2045 for all scenarios A-C.    
> Provide the CI number for each year 2010-2045, the origin CI number, and do the same for each scenario A-C.    
> Provide the CI percentage reduction for each year, and the origin CI %, and do the same for each scenario A-C.    
> Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.

> Provide the list of resources

**2)  LCFS CI Benchmark, the Linear percentage annual change between the period of years 2030, 2035, 2040, and 2045.**

>  What is the linear % change for the years: 2024-2030 for each scenario A-C?

>  What is the linear % change for the years: 2030-2035 for each scenario A-C?

>  What is the linear % change for the years: 2035-2040 for each scenario A-C?

>  What is the linear % change for the years: 2040-2045 for each scenario A-C?

**3)  LCFS reduced Values annually**

> What is the LCFS reduced value for each year 2023-2045 from the Modeling impacts of the lower CI in your proposal for each scenario A-C?

> What is the LCFS reduced % value for each year 2023-2045 from the Modeling impacts of the lower CI in your proposal for each scenario A-C?

**4) LCFS Deficits Generated**

> Provide the estimated Deficites generated each quarter for each year 2023-2045 for each Scenario A-C.

> Provide the historic Deficites generated from each quarter for each year 2010-2022

> What is the deficit outlook % increase for each year 2023-2045 from the Fuel Benchmark changes for each Scenario A-C?

> Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources

**5) LCFS Credits Generated**

> Provide the estimated Credits generated each quarter for each year 2023-2045 for each Scenario A-C.

> Provide the historic Credits generated from each quarter for each year 2010-2022

> Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources

**6) 5.0 EER Credits Generated and the kWh average rate earned**

> Provide the estimated kWh rate value generated each year 2023-2045 for each Scenario A-C.

> Provide the historic  kWh rate generated from each year 2010-2022

> Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources

**7) CI Electricity as a Transportation Fuel Pathway as shown on p 13 of the CATS PDF Model document.**  
> This table provides CI numbers for each year during 2022-2045  
> This table provides assumptions of CI reduction percentages for each year 2022-2045 as per *Alt 3 Scoping Plan CI Relative to 2021*  
> Provide the CI number for each year 2010-2045, and the origin CI number  (will only apply to years 2022-2045 if it has changed)  
> Provide the CI percentage reduction for each year 2010-2045, and the origin CI % (will only apply to years 2022-2045 if it has changed)  
> Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources  
  
  
**8)  ELC000L00072023 California average grid electricity used as a transportation fuel in California.**  
>  The current proposed CI for the year 2023 update to Electricity Lookup Table Pathways is 81.00 CI  
>  Explain how your CATS Table 10 on page 13 with a CI for years 2023 of 69.50 is established.  
>  What is the purpose of not aligning it with the annual trued-up values for 2023?  
>  See the link below for comments due on 12-31-22 relating to this True up for the year 2023

**9) Explain how the EER values are being updated (if are) based on HDV EV Performance data collected.**  
>  HDV EV VMT Data was novel; however, it is now available as it relates to Electricity as a Transportation fuel which is impacted by the EER.

>  Specifically, the scoping plan on pg 49 demonstrates the MD EV sales share is critical to GHG reduction and VMT.    
>  How are the MD vs HD real-world Electricity as a Transportation  Fuel and the number of EV miles traveled being analyzed with the current data?

> Provide any calculations in your analysis in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources

**10a)  MHD FCI Fueling Stations.**

> The current LD FCI station’s fueling capacity generation covers 10-20% utilization and can generate infrastructure credits for 5 yrs or when the total revenue exceeds capital expenses for the station, whichever comes first.

> The current HRI is based on 100% of the station capacity and can generate infrastructure credits for 15 yrs or when the total revenue exceeds capital expenses for the station, whichever comes first.

>  Currently applications for new stations can only be accepted as long as the estimated potential HRI and FCI credits from all approved stations do not exceed 2.5% of LCFS deficits in the prior quarter.

> The proposal as shown on p 34 for the MHD FCI Fueling stations uses 5% of deficits or 10% of deficits.

**10b) FCI/HRI Credits Generated:**

> Provide a history of the quarterly results each year from the FCI/HRI programs to date:  1)  credits per quarter   2)  deficits per quarter

***For example:***

> **Q1 2022**:  Deficits generated = 5.14M.    2.5% Cap allowed =  128k.   Credits estimated = 73k.    <https://ww2.arb.ca.gov/resources/documents/lcfs-zev-infrastructure-crediting>

> **Q2 2022**:  Deficits generated = 5.39M.    2.5% Cap allowed = 134k.   Credits estimated = ?  *Please provide this answer*

**FCI Credits Generated:**

> Provide the number of estimated credits generated each quarter for each year 2023-2045

> Provide the historic number of credits generated each quarter for each year 2019-2022

> Provide a history of the quarterly results from the existing FCI stations to date: 1) kW per site  2) utilization % covered  3) Cost of site  4) are any of these sites not likely on target to collect its cost?

**HRI Credits Generated:**

> Provide the number of estimated credits generated each quarter for each year 2023-2045

> Provide the historic number of credits generated each quarter for each year 2019-2022

**10c) Pending FCI/HRI Applications?**

> How many FCI Pending Applications are there currently?

> How many HRI Pending Applications are there currently?

> In your responses to 10a-10c, provide any calculations in your analysis in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources

**11)  Scoping Plan and MHD FCI Charging Stations**

> Where in the Scoping plan can you find the proposal for the FCI MHD Stations?

>  Where are the details to support LD to be mixed with MHD?

> These stations should support Private Access Fueling Facilities with NO LDA

>  The MHD program needs to allow more years for the cap, allow 10 years for the cap, as the cost of MHD chargers is on average double if not more per site due to the High Voltage Power that will be a priority for MHD FCI stations and the increased amount of real estate to be devoted to charging MHD vehicles.

> Where are the analysis to support the 5-year cap for MHD compared to LDA?

> In your responses provide any calculations in your analysis in an Excel format by creating a table of the data with transparency on the calculations and formulas used.  
> Provide a list of the resources  
  
  
Link is below to the 2023 California Average Grid Electricity Used as a Transportation Fuel in California and Electricity Supplied under the Smart Charging or Smart Electrolysis Provision, comments are due 12-31-22.  
<https://www.arb.ca.gov/fuels/lcfs/fuelpathways/comments/tier2/2023_elec_update.pdf?_ga=2.1462642.217825719.1668290253-1836391743.1666026400>