



February 18, 2020

Uploaded to CARB's 2019 LCFS comment portal

Re: Notice of Public Availability of Modified Text and Availability of Additional Documents and Information for the Proposed Amendments to the Low Carbon Fuel Standard Regulation

Dear Mr. Corey:

CalEtc appreciates this opportunity to SUPPORT the February 3, 2020, staff's proposed amendments to the Low Carbon Fuel Standard regulation. We believe the amendments adequately address all comments submitted and reflect CARB Board direction; we urge you to take final action to adopt the regulation. CalEtc would also like to acknowledge our appreciation of the tremendous effort and accessibility of CARB staff during the extensive public process leading up to November 2019 CARB Board hearing and the release, February 3, 2020, of proposed amendments to the LCFS.

CalEtc supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalEtc is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail.

The staff's proposed amendments to the LCFS appropriately address the CARB Board direction to staff and are responsive to public comments submitted by CalEtc and others during the November 2019 CARB Board hearing process, including:

- **Rural projects:** Adding rural projects to the list of eligible equity holdback projects addresses an important barrier to making sure all Californians benefit from EVs.
- **Administrative costs:** Providing improved flexibility on how to address administrative costs and allowing the Executive Officer to approve exceeding the administrative cost cap will make the utilities' LCFS programs more successful and reduce risks.
- **Advanced credits:** The amendments specific to advanced credits in the Credit Clearance Market are appropriate and consistent with the intended goal of cost-containment of LCFS credit value.

CalEtc looks forward to continuing our work with CARB staff on this important regulation.

Regards,

A handwritten signature in blue ink, appearing to read "EWTutt", is centered on the page. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition

cc: Rajinder Sahota
James Duffy
Arpit Soni