



September 19, 2022

SUBMITTED ELECTRONICALLY

California Air Resources Board
Attn: Cheryl Laskowski
Transportation Fuels Branch
1001 I Street
Sacramento, CA 95814

Re: Comments on Potential Changes to the Low Carbon Fuel Standard

Dear Ms. Laskowski:

The Global Cold Chain Alliance (“GCCA”) appreciates this opportunity to provide further feedback to the California Air Resources Board (“CARB”) on potential changes to the Low Carbon Fuel Standard (“LCFS”) Program. As noted in our comments submitted August 8, 2022, GCCA represents 1,100 member companies in 85 countries, including strong representation from members with operations in California, who serve the food industry by providing third-party, temperature-controlled supply chain services. Our members provide temperature management of perishable products to maintain quality and safety through the distribution chain to the final consumer, and we look forward to working with CARB to advance low-carbon and zero-emission transportation solutions in this industry. We provide the below comments in response to CARB’s second public workshop on potential changes to the LCFS Program on August 18, 2022 (the “August 18 Workshop”).

One potential change that CARB staff discussed at the August 18 Workshop is potentially adding verification requirements for certain electrification transaction types, including electric transport refrigeration unit (“eTRU”) charging. Currently, verification of quarterly transactions is only required for transactions involving liquid fuels, natural gas vehicle fueling, propane fueling, and certain fuel cell vehicle fueling.¹ Verification requirements include, among other things, preparation of a verification plan, document review, and a site visit to the “fuel production facility” at least annually.²

As noted in our August 8, 2022, comment letter, the LCFS Program currently provides that credits for eTRU charging are generated by the eTRU itself (which is identified in the LCFS Regulations as the fuel supply equipment, or “FSE”), rather than the stationary charging

¹ 17 Cal. Code Reg. § 95500(c)(1).

² *Id.* at § 95501(b).

equipment at a facility.³ Under this current credit generating structure, it appears that requiring verification of eTRU fueling transactions would require a “site visit” to every mobile eTRU that is registered in the LCFS Program.

Verification of eTRU transactions would be far less burdensome if the LCFS credits were generated by the eTRU charging equipment that supplies the electricity to the eTRU units. Defining the eTRU FSE as the charging equipment would significantly reduce the number of entities subject to the requirement, and the number of verification reports and associated site visits, required for compliance. This approach would reduce the overall costs to both CARB and regulated parties of imposing such a verification requirement in the LCFS Program compared to requiring verification of each individual eTRU.

Verification of the eTRU charging equipment would not be without its burdens for eTRU charging equipment owners. Our members’ facilities are often secured facilities, and site visits would require coordination with and full oversight by facility personnel. Visitors to these sites are typically required to provide identification and safety certifications and must be accompanied by facility personnel for the duration of the site visit. Verification would also require facility personnel’s time to gather the necessary records and respond to questions.

The value of requiring verification for such electrification transactions is somewhat unclear. As opposed to a liquid fuel with a site-specific carbon intensity (“CI”) score, where verification includes sampling of raw materials and final products and confirmation of the fuel production process, the fuel pathway for electric charging is well understood and consistent between various electric charging infrastructure. The eTRU charging CI score is based on the electricity provided, not site-specific factors. No on-site changes in methods or operation will impact the CI score. Thus, the value of site visits to verify the eTRU charging equipment appears to be of limited value, especially when compared to the burdens it will impose on site owners and operators.

Nevertheless, should verification of eTRU charging transactions be required, it would be much easier and less resource-intensive if the FSE is defined as the charging equipment, rather than the individual eTRUs.

We would like to thank CARB for the opportunity to submit comments on the LCFS proposed amendments. We look forward to continued collaboration with CARB on this rulemaking.

Best Regards,



Matthew Ott, M.S., FASAE, CAE, CMP
CEO, Global Cold Chain Alliance

³ See GCCA’s August 8, 2022, comment letter at Section II, for discussion of the allocation of eTRU charging credits.