



July 20, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Re: Public Comments and Feedback on the LCFS
Potential Changes to the Low Carbon Fuel Standard**

Dear CARB Board Members and Staff,

While the California Air Resources Board and staff are revising the LCFS program changes, we would like to take this opportunity to share two very specific and critical modifications for your consideration.

ISSUE 1 OF 2:

Automobile Manufacturers (OEM) receive preference for incremental credits in residential areas. They use this tool to 'blank register' all their EV vehicle VINs to electric vehicle chargers that they do not own.

THE PROBLEM:

Installations in disadvantaged Multi-Unit Dwelling communities can be cost-prohibitive. With OEMs grabbing the incremental credits, it cuts out the financial incentives and cost reductions for low-income and multi-family dwelling units.

SCENARIO:

This is just one example of many. We ran into a situation where we tried to register a charger in a residence for incremental credits using the VIN of our company-bought electric vehicle. A company installed and managed an EV charger on which we had complete usage reports. Additionally, this residence had a solar system and battery setup, which would provide a clear Lower CI score than utilizing grid electricity. We were rejected in our registration because the VIN of the company-bought vehicle apparently had already been registered by the car manufacturer.

SOLUTION:

Instead of allowing OEMs to jump the line and gobble up the incremental credits, allow multi-family dwellings to apply for them, particularly in disadvantaged communities. This will move the incentives and lower the costs to those who need it most. It will also further the adoption of electric vehicles to meet the spirit of environmental equality. Most people today do not have range anxiety when it comes to electric vehicles; they have charging anxiety. This will eliminate the apprehension allowing them to charge at home.

By focusing on who is reducing the CI score and where the vehicle is actually charging, the drivers and owners of the properties can better afford EVSE infrastructure, which will dramatically increase adoption and usage.

ISSUE 2 OF 2:

LCFS credits can be applied to commercial and retail properties. However, they are unavailable for Multi-Unit Dwellings connected to a commercial utility meter. Therefore, MUDs do not have the necessary revenue for ongoing repairs, upgrades, and maintenance.

THE PROBLEM:

The crescendo amongst policymakers is to install electric vehicle charging infrastructure in Multi-Family Dwelling Units (MUDs) since that is where most low-income families live and park their vehicles. However, the difficulty is most apartment owners want to make sure the cost of the installation and the cost of the electricity used by the drivers is covered, at least partially, so that they will not have to charge their tenants for this benefit, which may be expensive for the tenants as well.

LSE's have claimed to categorize MUDs as commercial, not residential properties. Since LCFS credits only apply to commercial properties and the LSE's need networking to track usage and more.

The most significant barrier to electric vehicle adoption is not range anxiety but charging anxiety. If most people could charge where they live, that would dramatically affect EV acceptance.

THE SOLUTION:

Typically, a workplace and MUD would operate similarly from a charging perspective because both are not publicly accessible and would need networking to track usage and more. This already answers the LSE's 'perceived' issues.

MUD, especially MUD DACs, would benefit significantly from additional revenues from LCFS credits and expand EV adoption to those who would benefit the most.

Allowing MUDs to receive revenue from LCFS credits would significantly improve the economics and enable low-income and DAC drivers and building owners to install electric vehicle chargers at a much faster pace.

Thank you for considering these critical LCFS policy modification suggestions. We believe that these two policy changes alone would dramatically improve the barrier to entry for multi-family dwelling households and provide a quicker adoption rate in low-income communities.

Sincerely,

danilo toskovic