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July 5, 2018

SENT VIA ELETRONIC SUMBISSION

Mr. Sam Wade
Chief, Transportation Fuels Branch
California Air Resources Board, Industrial Strategies Division
P.O. Box 2815
Sacramento, CA 95812

RE: June 20, 2018 Public Availability of Modified Text and Availability of Additional Documents and Information for Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels

Dear Mr. Wade,

Thank you very much for the opportunity to submit comments on the on the most recent 15-day Notice made available on June 20, 2018. SRECTrade appreciates staff's June 11, 2018 presentation. We appreciate the consideration to allow the owner of fuel supply equipment (FSE) at multi-family properties to opt in to generate LCFS credits. Additionally, the opportunity to submit Tier 2 applications to request EER-adjusted CI values for vehicle-fuel combinations not previously considered is a welcomed addition.

In the presentation, slide 30 speaks to Electric Vehicle Charging and the Hierarchies of Credit Claims. The last bullet on the slide notes that owners of EV charging equipment (i.e. FSE) can designate any other entity to claim credits on its behalf. SRECTrade appreciates this consideration and believes that the ability for charging equipment owners to designate other entities to claim the LCFS credits on their behalf is imperative to allow some owners to participate in the market. Without the ability to designate another party to act on their behalf, they may not enter the market at all.

While it appears that the intent of this modification is to allow third parties to act as an agent on behalf of the equipment owner, we would request some clarification in the ability of the designated-third party to register the charging equipment of a variety of different owners into one aggregated account in the LRT-CBTS. This would simply allow the third-party designee to manage multiple different owners charging equipment in one single LRT-CBTS account. It appears that the ability to facilitate this under the modified regulations is possible, but it is not clearly defined. While we do not intend to unnecessarily clarify something, we would appreciate staff's consideration on this matter. We believe that if our company or others are to provide a third-party service to charging equipment owners, it is important to clarify the possibility of this relationship in the regulations. If this is already clarified in a section of the modified regulations and we have misread or misunderstood the documents, we would appreciate you directing us to the specific language.

By way of background, included herein is a document that the PJM Environmental Information Services tracking registry utilizes to demonstrate owner's consent for a third-party to handle all registry, reporting, and credit services on their behalf (see Exhibit A: SCHEDULE A Generator Owner's Consent). We believe this may be a good example of how owners can designate third parties to act on their behalf within the CA LCFS market.

Thank you very much for your time and consideration as you review these comments. If desired, we welcome the opportunity for further clarification and discussion of our comments.

Best Regards,

A handwritten signature in black ink that reads "Steven Eisenberg".

Steven Eisenberg, CEO
SRECTrade / 201 California St. #630 San Francisco, CA 94111 / (415) 702-0863 / steven.eisenberg@srectrade.com

The undersigned on behalf of the Generator Owner, _____,¹
represents to PJM Environmental Information Services, Inc. ("EIS") that:

1. I/we am/are the Generator Owner who holds legal title to the Generating Unit(s) designated below.
2. I/we, the Generator Owner, (check one)
 - ☐ Hereby grant authority and permission to Account Holder, _____,² to create and trade all Certificates associated with the following Generating Unit(s), which Certificates shall also be registered to the GATS account(s) of the Account Holder.
 - ☐ Hereby elect to create and trade all Certificates associated with the following Generating Unit(s) within my own GATS account.
3. I/we, the Generator Owner, further represent that I/we have not granted similar authority or permission to any other subscriber or account holder for use in the GATS or any similar system.
4. I/we, the Generator Owner, understand that this Consent supersedes any and all Consents that have been submitted prior to the Date specified herein. Any and all prior Consents will be considered null and void and the assignment of rights terminated.
5. The assignment of rights that occurs within this Consent does not absolve the Generator Owner from upholding any contractual obligations that exist outside of GATS.
6. By executing this Consent the Generation Owner represents it does not have any contractual obligations that would preclude the execution of this Consent.

Generating Unit Name and Address Optional: [Generating Unit Size/System Size]	PJM MSET ID <u>or</u> EIA Plant Code and Generator Identifier (as applicable)

GENERATOR OWNER³

Name: _____

Title: _____

Date: _____

Directions for Generator Owner's Consent

All information on this Generator Owner's Consent must be typed or neatly printed in blue or black ink as follows:

1. Fill in the Generator Owner's full legal name, i.e. ABC Domestic Energy Company, Inc.
2. If first checkbox selected, fill in the Account Holder's full legal name, i.e. ABC Domestic Energy Company, Inc. If Generator Owner is an individual who wishes to manage their own system then select the second checkbox.
3. If Generator Owner is a corporation, partnership or other legal entity, this Consent must be executed by a company officer of the Generator Owner. If Generator Owner is an individual, this Consent must be executed by the individual.
4. Return the original, completed Consent to:

**GATS Administrator
c/o PJM Environmental Information Services, Inc.
2750 Monroe Avenue
Audubon, PA 19403-2497**