



August 23, 2018 | Submitted Electronically

Mr. Sam Wade
Transportation Fuels Branch, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: SCPPA Comments on Low Carbon Fuel Standard Amendments (Point of Purchase Rebate Program)

Thank you for the opportunity to provide comments on the Low Carbon Fuel Standard (LCFS) amendments towards instituting a Point of Purchase (POP) Rebate Program. The Southern California Public Power Authority (SCPPA) supports proposed LCFS programmatic changes for this issue and appreciates CARB's dedication to work with stakeholders to advance implementation of a POP Rebate Program in a mutually agreeable manner.

SCPPA is a joint powers agency whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Our Members collectively serve nearly five million people throughout Southern California. Each Member owns and operates a publicly-owned electric utility governed by a board of local officials who are directly accountable to their constituents.

Seven SCPPA Members have currently opted-in to the Low Carbon Fuel Standard Program and value being able to participate in this Program. The opted-in members offer a variety of programs that enable ratepayers to understand and enjoy the benefits of operating vehicles that run on low carbon fuels; examples include free charging, education and outreach, access to charging infrastructure, new electric vehicle rebates, and used electric vehicle rebates for low-income customers.

SCPPA Members remain confident in their ability to participate in the LCFS Program through collective conversations with CARB staff, CalETC, and the Auto Alliance that have enabled clearer direction in the most recent 15-day changes. Specifically, SCPPA appreciates and supports collaborative efforts with CARB and CalETC that have:

- Set four rebate tiers to determine rebate amounts based upon battery capacity;
- Defined publicly-owned utilities (POUs) based upon 2017 load (large, medium, small);
- Set different percentages of credit amounts for Electrical Distribution Utilities to contribute to the statewide POP for Large POUs, Medium POUs, and Small POUs – potentially subject to adjustments in 2025; and
- Set lower POP contribution percentages in years 2019 through 2022, which minimizes interruption to popular local programs.

Thank you for your time and consideration. We remain ready to meet with CARB staff and other agencies to work towards mutually agreeable solutions that best advance California's climate change goals in an affordable manner for our ratepayers.

Respectfully submitted,



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