



April 16, 2018

Sam Wade  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
*Via Electronic Submission*

**RE: Comments on the 2018 Amendments to the Low Carbon Fuel Standard Program**

Dear Mr. Wade,

Borrego Solar Systems, Inc. (Borrego) appreciates the opportunity to provide comments to the California Air Resource Board (CARB) on the 2018 Amendments to the Low Carbon Fuel Standard (LCFS) Program.

Borrego specializes in developing, engineering, constructing, and maintaining commercial-scale solar and energy storage projects. Since 1980, Borrego has deployed nearly 450 MW of solar generation, over 120 MW of which are sited in California. We are also a leading developer of community solar.

Borrego supports the proposal to allow LCFS credit generators within the electricity pathway, such as electric vehicle (EV) manufacturers and EV charging station providers, to match EV charging data with solar energy generation to generate LCFS credits with a zero Carbon Intensity (CI) value. This will increase the ability of distributed solar energy to support the deployment of electrified transportation in California.

We support the following proposed requirements for book-and-claim accounting for renewable electricity supplied as a transportation fuel:

- Physical traceability would not be required if the renewable electricity is supplied to the grid within a California Balancing Authority.
- Book-and-claim accounting for renewable electricity may span two quarters.
- LCFS credit generators may use book-and-claim accounting to match renewable electricity with charging that is not co-located. This electricity could be generated through the Green Tariffs Shared Renewables program, other community solar or offsite distributed solar programs, or through other contractual relationships.

- LCFS credit generators can retire the Renewable Energy Certificates (RECs) of the renewable electricity that is matched to EV charging to show additionality.

We recommend two minor modifications:

- CARB should clarify that the LCFS credit generator does not need to own the underlying renewable electricity generation equipment in order to have a clear right to the renewable attributes (i.e. RECs) of the renewable electricity produced.
- If generation invoice information is provided to the Executive Officer, pricing information should not be required due to the sensitivity of that information.

Borrego appreciates the opportunity to provide comments. Thank you for your time and thoughtful consideration of this matter.

Respectfully submitted,

/s/ Rachel Bird

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