

Cheryl Laskowski, Branch Chief
Low Carbon Fuel Standard Program
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Re: Electric Vehicle Charging Association comments on November 9th Workshop
on Potential Changes to the Low Carbon Fuel Standard**

Dear Ms. Laskowski,

The Electric Vehicle Charging Association (EVCA) is a not-for-profit trade organization of 19 leading EV charging industry member companies and two zero-emission autonomous fleet operators. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

We thank the California Air Resources Board (CARB) for hosting the November 9th Public Workshop to discuss the potential changes to the Low Carbon Fuel Standard (LCFS) and providing the opportunity for comment. EVCA suggests the following changes to the LCFS program, which will maximize the potential for the LCFS to accelerate the transition to a zero-carbon transportation fuels future:

1. Implement stronger 2030 and post-2030 CI targets.

CARB should strengthen and increase the CI reduction targets to at least 30% reduction below the 2010 baseline by 2030 and align its long-term goals with the

state's overall climate goals. A target of 30% by 2030 will also support the credit market and send a positive signal to clean fuel and infrastructure investors.

2. Implement a nonlinear approach to stringency.

We see a need for the stringency increase to be nonlinear, with a larger increase in stringency in 2024 to correct for the time lag inherent in regulatory modifications needed to improve the LCFS. After correcting course in 2024, it can return to a straight line toward 30% (or higher) in 2030.

3. Provide an acceleration mechanism to provide certainty to the alternative fuel low-carbon fuel industry and consumers.

From the program's inception minimal attention has been directed at effectively responding to overperformance of the LCFS. The program continues to overperform by exceeding carbon intensity reduction targets and adding to a growing bank that now stands at over 10 million credits. The market has consistently out-performed the standards and the model of waiting for a new round of amendments has resulted in missing opportunities to reduce millions of tons of greenhouse gas (GHG) emissions.

We propose an acceleration mechanism (also called a ratchet mechanism) that dynamically responds in the event of future sustained and significant CI target reductions by further tightening the stringency. The inclusion of an acceleration mechanism will help to ensure that, when sustained overperformance occurs, the regulation can continue to send strong market signals that will drive innovation and deliver further GHG reductions. It would not replace the need to increase stringency to a minimum of 30 percent in 2030, or the need for a non-linear increase in stringency in 2024 but work together with them to help capture the potential emission reductions and protect consumers. This could be used to increase

stringency should market indicators limit emission reduction potential and to provide certainty for credit generators and consumers.

4. Support CARB's Alternative Scenario B

We are supportive of Alternative B as defined in CARB Staff's Preliminary Scenario Design Options. Alternative B includes a CI reduction target to at least 30% reduction below the 2010 baseline by 2030, at least 90% reduction below the 2010 baseline by 2045, and supports the state's Medium- and Heavy-Duty ZEV deployment represented in Baseline assumption.

Please do not hesitate to contact us if you have any questions. Thank you for your consideration.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association