

Cheryl Laskowski, Ph.D.
California Air Resources Board
1001 "I" Street
Sacramento, California 95814

RE: 23-8-1: Public Meeting to Hear an Update on the Low Carbon Fuel Standard.

Dear Dr. Laskowski,

Southern California Edison (SCE) appreciates the opportunity to comment on the Public Meeting to Hear an Update on the Low Carbon Fuel Standard (LCFS).

SCE believes that LCFS has been instrumental in helping to accelerate the adoption of alternative transportation fuels and that California continues to need a strong LCFS that can be leveraged and grow over time.

As an active participant in the LCFS program, SCE has implemented multiple LCFS-funded transportation initiatives, including offering our customers a pre-owned electric vehicle rebate of \$4,000, and we are also in the process of implementing over \$224 million in programs, including:

- Charge Ready Home, that will help residential customers cover the costs of upgrading their panels to support EV charging, and
- A Drayage Truck rebate, among others.

We also serve as the administrator for the CARB-mandated California Clean Fuel Reward (CCFR), which distributed over \$400 million in rebates to nearly 400,000 EVs in 2021 and 2022. Unfortunately, this success caused the CCFR program to be paused, as the interest in the program is greater than the LCFS revenues could support.

SCE believes the following modifications are needed to strengthen the LCFS regulation:

- A minimum 30% reduction in the Carbon Intensity Target for 2030;
- The adoption of a trigger mechanism that could accelerate the compliance schedule, when certain parameters are met;
- Providing additional options and clarification of the programs and projects that are eligible for the LCFS holdback revenues that will help streamline the approval process and support the state's carbon neutrality goal; and,
- To continue collaborations with CARB staff to modify the CCFR to better support low- and moderate-income individuals.

SCE thanks CARB for considering the above comments on the Update on the Low Carbon Fuel Standard. We also would like to thank CARB Staff for their hard work.

Please do not hesitate to contact me at (626) 302-7389 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Ignacio M. Fernandez". The signature is stylized with a large initial "I" and a long horizontal stroke at the end.

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