

**April 20, 2018**

**Rana McReynolds, Clerk of the Board**

California Air Resources Board  
1010 I Street  
Sacramento, CA 95814

**RE: Support Sonoma Clean Power Authority Comments on 2018 Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation**

To: Ms. McReynolds,

Launched in March, 2018, Monterey Bay Community Power (MBCP) provides carbon-free electricity to customers in Monterey, Santa Cruz and San Benito counties.

MBCP endorses the comments submitted by Sonoma Clean Power Authority (SCP) regarding the 2018 proposed amendments to the LCFS Regulation.

Reducing the environmental impact of transportation systems is a central goal of our organization. We believe the comments submitted by SCP would support the accelerated transition to the low-GHG transportation future we envision for our service territory, by ensuring that the LCFS Regulation accurately reflects the Carbon Intensity of different retail electricity mixes and allows all Load Serving Entities the chance to administer the credits generated by their EV customers.

Electric vehicles and charging infrastructure are being deployed with increasing success across our Counties and State. However, to maximize the positive environmental benefits of this trend, the State needs a corresponding increase in charging sources with low emissions intensity. We believe that lowering the emissions associated with charging through cleaner generation sources (like SCP, MBCP, and other CCA service offerings), on-site generation of renewables, and/or charging during times of the day and year when clean generation is abundant are all effective means to achieve this.

We're thankful for CARB's leadership on this important matter and encourage you to enable agencies like ours to help further contribute to the State's ambitious climate goals.

Regards,

A handwritten signature in blue ink, appearing to read "Tom Habashi", followed by a horizontal line.

**Tom Habashi, CEO Monterey Bay Community Power**  
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