



November 5, 2020

Katrina Castellano
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Amendments to the California Low Carbon Fuel Standard

Dear Ms. Castellano,

Electrify America, LLC, appreciates the opportunity to comment on proposed changes to the California Low Carbon Fuels Standard (LCFS). Electrify America operates the largest open network of DC fast chargers in the nation, including 551 ultra-fast chargers across 131 commissioned sites in California. Electrify America also supported the installation of numerous workplace Level 2 chargers that are registered with the LCFS program, and recently deployed 28 innovative grid-independent, solar-powered Level 2 chargers across 14 rural locations in the state.

Electrify America has developed and implemented robust data validation procedures with regard to EV charger utilization data submitted to the Air Resources Board. First, Electrify America has a technical consultant who reviews back-end session-level information for anomalies when generating the initial inventory. Secondly, Electrify America has an external reporting services consultant who performs numerous checks on session details to ensure that chargers are performing within specification. Lastly, Electrify America has designated a third-party credit generator, who is responsible for ensuring accurate registration of charging assets and submission of session data under appropriate FSE IDs. These companies contribute diverse technical expertise to ensure the validity of the final data submitted to the Air Resources Board.

Electrify America understands that CARB is considering requiring third-party verification for electricity transactions reports, as discussed during the October 14 workshop. Third-parties currently verify Electrify America station transactions as discussed above, but we are concerned that requiring the use of CARB-registered third-party verifiers may create additional administrative burden and cost. Given that companies like Electrify America have already implemented robust verification procedures, we would request that any additional third-party verification requirements be implemented in the least burdensome way possible. For instance, CARB should establish a straightforward process for entities already providing LCFS data verification services to become certified third-party verifiers under the program, without significant additional burden or cost.

Electrify America looks forward to continued collaboration with the California Air Resources Board, and we would be happy to discuss or clarify this feedback for staff at any time.

Sincerely,

/s/

Matthew B. Nelson
Director of Government Affairs