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California Air Resources Board
1000 I Street
Sacramento, CA 95814
Submitted Electronically

Re: Weave Grid, Inc. Supportive Comments in Response to Proposed Second 15-Day Changes: Proposed Low Carbon Fuel Standard Amendments

Dear Chair Randolph, Honorable Board Members, and California Air Resources Board Staff,

Weave Grid, Inc. (WeaveGrid) respectfully submits these supportive comments in response to the California Air Resources Board (CARB) Proposed Second 15-Day Changes to the Proposed Low Carbon Fuel Standard (LCFS or Program) Amendments posted on October 1, 2024.

I. Introduction

WeaveGrid is a California-based software company that helps load-serving entities support increased adoption of electric vehicles (EVs) through greater understanding of EV driver charging behaviors and vehicle-grid integration. WeaveGrid's technology leverages utility and charging data, including the embedded vehicle telematics—data, controls, and communication systems—and the charging equipment to transform unpredictable and disaggregated EV charging loads into a cohesive network of controllable grid resources. We also support load-serving entities in engaging their EV customers with personalized messages, insights, and notifications via the web, email, and text. Our approach enables broad participation in EV load management programs, while helping reduce the costs to serve EV loads. WeaveGrid is a market leader in providing these solutions.

II. Comments

A. WeaveGrid lends overarching support for the Low Carbon Fuel Standard.

WeaveGrid appreciates Staff's thoughtfulness with the further proposed amendments to the LCFS regulation. WeaveGrid also appreciates that Staff has provided ample opportunities for stakeholders to participate in the rulemaking process.

LCFS plays an essential role in supporting California's ambitious transportation electrification and climate goals. It is a source of funding for many existing and planned transportation electrification initiatives and without the important proposed amendments to this source of funding, we believe a range of the State's transportation electrification goals could be impacted or imperiled. WeaveGrid supports the regulation and the proposed amendments outlined in December 2023, August 2024, and October 2024.

The LCFS Program involves a diverse range of stakeholders. WeaveGrid is cognizant of the varied concerns in regard to the Program and is supportive of further amendments that strengthen the regulation in meeting its overall objectives to lower emissions from the transportation sector. That said, we also believe it is of critical importance that the Program move forward, potentially with identified areas for improvement following this rulemaking cycle. As stated above, LCFS is a fundamental piece of the transportation electrification support system in California. From our view, WeaveGrid does not have a unique viewpoint among the transportation electrification industry. We believe the industry as a whole is highly supportive of the regulation and we are hopeful that Staff, the Board, and stakeholders can come to an agreement in November such that the proposed amendments are approved and the Program continues to deliver significant benefits, as it has a track record of doing so.

B. WeaveGrid commends CARB for retained language on vehicle-grid integration (VGI).

WeaveGrid is strongly supportive of the retained proposed amendments within Section 95483(c)(1)(A)5.b. originally from the December 19, 2023 proposed amendment.¹ As EV adoption in California increases, California needs to adapt the grid accordingly. WeaveGrid appreciates that the focus of these proposed additional allowable holdback projects supports greater grid investment to accommodate a growing number of EVs on California's roads. We support the additions in this section, including investments in distribution infrastructure for EV charging, support for vehicle-grid integration (VGI) projects, and

¹ Appendix A-1 Proposed Regulation Order: Proposed Amendments to the Low Carbon Fuel Standard Regulation (Appendix A-1), Section 95483(c)(1)(A)5.b., p. 46, https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/2nd_15day_atta-1.pdf.

technology, such as EV load management software, that can avoid or reduce grid upgrades. Distribution grid investments ensure that charging infrastructure needs are met, especially in underserved communities and for medium- and heavy-duty electric vehicles. VGI projects help EV drivers charge when and where it is most beneficial for the grid and customers.² VGI enables cleaner charging by increasing renewables integration and providing a signal for drivers when it is cleanest to charge.³ Technology helps enable VGI and makes it more driver-friendly by being more automated. VGI projects that use automated technology can benefit from greater participation and, therefore, better outcomes.

Increasing the use of VGI in California is critical to meet clean electricity, clean transportation, and affordability goals. Electrical distribution utilities (EDUs) are the key stakeholder to enable effective VGI. More sophisticated VGI includes managing EV charging based on ever-changing grid conditions. To enable cheaper and cleaner charging, technical grid inputs are required for VGI. For example, renewable energy curtailments can be reduced by charging more vehicles when renewable energy generation is abundant. Another example is avoiding charging when there is higher grid congestion at a local distribution or bulk system level. Among the many approaches to VGI, EDUs are best positioned to incorporate relevant grid signals into their VGI projects. It is for this reason that we emphatically support the VGI-related pre-approved uses for EDU holdback credits.

C. WeaveGrid commends CARB for increasing the clarity of EDU holdback credit requirements and pre-approved uses.

The LCFS regulation has a relatively narrow set of specified projects that qualify as holdback credit equity projects, per Section 95483(c)(1)(A)5.a.⁴ This can result in limiting the scope of what EDUs can do with this funding. In our view, any transportation electrification efforts that meaningfully benefit disadvantaged, vulnerable, and underserved communities should be eligible for LCFS funding. This is a best practice in line with what we see from other commissions, utilities, and federal and state agencies. WeaveGrid appreciates the amendment in this most recent October 2024 update that offers greater detail on opportunities to propose new holdback equity projects under the LCFS regulation, per Section 95483(c)(1)(A)5.a.ix.⁵ This is particularly important given that the California Public Utilities Commission also regulates use of EDU holdback credits. Increased clarity and flexibility improve the implementation process across two different state agencies.

² Lawrence Berkeley National Laboratory, Quantifying the Financial Impacts of Electric Vehicles on Utility Ratepayers and Shareholders, <https://emp.lbl.gov/publications/quantifying-financial-impacts>.

³ California Public Utilities Commission Decision 20-12-029.

⁴ Appendix A-1, Section 95483(c)(1)(A)5.a., p. 43.

⁵ Appendix A-1, Section 95483(c)(1)(A)5.a.ix., p. 46.

III. Conclusion

WeaveGrid appreciates the opportunity to submit these supportive comments. We thank CARB for consideration of these comments and look forward to continued engagement.

Respectfully submitted,

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