



23 April 2018

Sam Wade
Low Carbon Fuel Standard
California Air Resources Board
State of California

Re: Proposed amendments to the Low Carbon Fuel Standard.

Dear Mr Wade,

Jaguar Land Rover North America LLC (JLR N.A.) welcomes the opportunity to comment on the proposed amendments to the Low Carbon Fuel Standard (LCFS).

As a company that is deploying all-electric and plug-in hybrid vehicles in California, Jaguar Land Rover continues to support policies that promote the advancement of electrification in the State and globally.

The widespread availability of electricity as a transportation fuel means that EV customers can use residential, workplace, private, public or commercial charging solutions. We support the staff's stated goal to simplify EV charging reporting while providing opportunities for greater participation.

However, the current LCFS legislation and staff's proposed amendments,

- Introduce unnecessary reporting complexity and, in practice, limit EV manufacturers' participation to the incremental EV charging pathways,
- Undermine the State's own ZEV goals by further compartmentalising CARB policies, fragmenting and limiting opportunities.

Jaguar Land Rover invites the Air Resources Board to develop the LCFS EV charging reporting requirement and market participations on the realization that **the common denominator across all EV charging events is the electric car.**

We, therefore, request that the California Air Resources Board:

- Clearly and very specifically allow EV manufacturers to claim Non-Residential EV charging credits and base reporting based on actual vehicle charging records.
- Allows EV manufacturers to opt-in to the metered Residential EV charging pathway.

Automakers are ideally placed to acquire and report accurate and verifiable EV charging records, including Time-of-Use. EV manufacturers are also best placed to use the credit proceeds to further the advancement of electrification including at the point of sale, at charging stations, through private-private and private-public partnerships. Credit proceeds would also be used to promote greater electric vehicle miles driven by plug in hybrids through innovative financial and smart charging incentives.

Thank you for your consideration of Jaguar Land Rover comments.

Sincerely,

Chris Marchand
Vice President Government and Industry Relations, Americas