

September 15, 2022

Jacob Englander  
Low Carbon Fuel Standard  
Division California Air Resources  
Board 1001 I Street  
Sacramento, CA 95814

**RE: Requested Change to the LCSF Program (Cal. Code Regs tit. 17CCR 95491 (d)(3)(C)1)**

Mr. Englander:

On behalf of the California Transit Association, I write to you today to formally request changes and/or amendments to the Low Carbon Fuel Standard (LCSF) that require non-residential EV charging industries and agencies generating credits from grid electricity to report the quantity of electricity (in kWh) from the fuel service equipment (FSE), or electric charger. This is required under Low Carbon Fuel Standard regulation (Cal. Code Regs. tit. 17 CCR 95491(d)(3)(C)1). The Association represents 220 member organizations nationwide, including 85 transit and rail agencies in California.

This request is being made to amplify the requests of our member agencies in accordance with the guidance issued by the California Air Resources Board (CARB) to industries and agencies participating in LCSF credit reporting, and information presented during CARB's public workshop "Potential Changes to the LCSF Program" on August 18, 2022, which establishes the request for stakeholder comments through September 19, 2022. This request also represents of our six recommendations to CARB for facilitating compliance with the Innovative Clean Transit regulation, as adopted by our Zero-Emission Vehicle Task Force.

Administrative Constraints:

As an Association, we are concerned with the administrative constraints associated with registering and reporting from each individual FSE. Several transit agencies have designed for an overhead charging system that will implement power cabinets (power source), and depot pantographs (dispenser to conductively charge on top of buses). The overhead charging design is a 3-to-1 ratio (3 pantographs to 1 power cabinet or 3 buses connected to 1 charger). With this, we have concerns about how data will be reported from this type of design, and the need to register and report from each individual charger (power cabinet) and/or pantograph (dispenser). To manage this type of overhead charging system, several transit agencies are

also planning to implement a charge management system (CMS) software to efficiently manage charging cycles optimally for getting buses ready for service each day and at its most cost effective. These CMS platforms are still in their infancy stages, with most vendors being third- party to charger manufacturers. It is currently unknown how a third-party vendor's CMS platform will manage multiple charger manufacturers (interoperability) data components and if proprietary parameters will impact data communication when exporting this data. At this time, to maximize credits using time-of-use energy consumption, we would need to report from the meter/utility bill.

Loss of Credit (Energy Loss/Line Loss):

Since January 2022, several transit agencies have experienced an overall loss of energy or line loss from what's reported at the meters to what's been reported at the FSEs. At full deployment, this loss can equate to hundreds of thousands of dollars in credit loss per quarter and millions of dollars in credit loss annually. Reporting with an energy loss or line loss (consumption in kWh) also doesn't accurately reflect the well-to-wheel GHG analysis for running a battery electric bus in-service.

In closing, we greatly value our partnership with ARB in advancing clean transportation service and we appreciate the flexibility option you are providing to transit agencies during these difficult times. We thank you for your consideration of our requested changes to the LCSF program.

If you have any questions, please feel free to contact me at (916) 446-4656 or [michael@caltransit.org](mailto:michael@caltransit.org).

Sincerely,



Michael Pimentel  
Executive Director

cc: Yachun Chow, Manager, Zero Emission Truck and Bus, Mobile Source Control  
Division Rachel Connors, Implementation Manger, Low Carbon Fuel Standard  
Division