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February 20, 2024

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

Re: Weave Grid, Inc. Comments in Response to 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 comments in response to the California Air Resources Board (CARB) Proposed Low Carbon Fuel Standard (LCFS) Amendments.

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 customer charging behaviors, managed charging programs, and distribution-level optimization. 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

WeaveGrid appreciates Staff's thoughtfulness with the proposed changes to the LCFS regulation. LCFS plays an essential role in supporting California's ambitious transportation electrification goals. WeaveGrid's comments focus on our support for

proposed changes to the regulation specific to holdback credits. We also recommend updated guidance for reporting incremental credits for residential EV charging. Overall, WeaveGrid is highly supportive of the efforts to increase the stringency of the program.

A. Strong support for broader use of holdback credits

WeaveGrid urges flexibility with the use of holdback credits. The transportation electrification sector is rapidly changing, which is encouraging. LCFS serves as an important source of funding in California to advance electric mobility. As needs evolve with the changing sector, a flexible use of LCFS holdback funds can maximize impact.

WeaveGrid particularly supports the proposed additions within Section 95483(c)(1)(A)5.b.¹ As EV adoption in California increases, we need to adapt the grid accordingly. We appreciate 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 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 for customers generally.² VGI enables cleaner charging by increasing renewables integration and providing a signal for drivers when it is cleanest to charge. 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.

B. Recommend updated guidance for reporting incremental credits for residential EV charging

We understand that after LCFS rulemaking updates, there can be updates to associated guidance documents. As such, we are using this comment opportunity to suggest an update to LCFS Guidance 19-03. Specifically, for Method 2, Option 1, we recommend that the minimum Geofencing Radius (GFR) be reduced from 220 meters.³ On-vehicle telemetry has advanced in recent years and particularly the component of telematics specific to identifying geographical location can be very accurate. The current GFR can be very

¹ Appendix A-1 Proposed Regulation Order, Section 95483(c)(1)(A)5.b., p. 45, https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/lcfs_appa1.pdf.

² LBNL, Quantifying the Financial Impacts of Electric Vehicles on Utility Ratepayers and Shareholders, February 2023, <https://emp.lbl.gov/publications/quantifying-financial-impacts>.

³ LCFS Guidance 19-03: Reporting for Incremental Credits for Residential EV Charging, p. 3, https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/guidance/lcfsguidance_19-03.pdf.

limiting for measuring incremental credits in densely populated areas where non-residential charging is prevalent, for example, in San Francisco. This update to the guidance can help various entities be further incentivized to provide and use cleaner charging.

III. Conclusion

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

Respectfully submitted,

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