ELECTRIC VEHICLE CHARGING ASSOCIATION

February 20, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: SUPPORT Proposed Amendments to the Low Carbon Fuel Standard Regulation

EVCA is a not-for-profit trade organization of 22 leading EV charging industry member companies and two zero-emission autonomous fleet operators. The association was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective industry voice for decision-makers in California.

The Low Carbon Fuel Standard (LCFS) has been instrumental in supporting California's transition to low-carbon fuels, and we applaud the effort by the California Air Resources Board (CARB) to make modifications to the regulation to adapt to the changing needs of the market. While EVCA is broadly supportive of the proposed modifications to LCFS and has separately submitted joint comments on various elements of the Proposed Regulation, this letter focuses on the issue of LCFS credits claimable by multi-family properties.

SUPPORT: LCFS credits for non-residential chargers at multi-family properties.
EVCA supports the amendment proposal to expand eligibility for LCFS credits to non-residential charging stations at multi-family residences. The ability to claim credits will encourage multi-family properties to deploy chargers and create new financing opportunities that reduce the cost of charger deployment for property owners. This proposal presents a powerful new tool to offer the convenience of home charging for residents of multi-family housing and address the gap in charger access for these residents compared to Californians living in single-family homes.

RECOMMENDATION: Allow multi-family residences with dedicated parking arrangements to claim LCFS credits.
While EVCA is supportive of the proposal to expand eligibility for multi-family residences to claim LCFS credits, we find the proposal stops short because it is not inclusive of chargers serving dedicated parking spaces. Restricting credits based on parking arrangements would be challenging to track and implement. Further, multi-family residences with dedicated parking arrangements face the same underlying barriers to charger deployment as properties with unassigned parking. Expanding LCFS credit eligibility to all non-residential station owners will alleviate the following challenges across the segment:

- **Station ownership.** Charging equipment serving dedicated spaces is often purchased, installed, and maintained by the property owner or by a 3rd party owner-operator charging network, as a service for residents. Though chargers serving dedicated spaces may serve a single household, the responsibilities and costs of managing and maintaining these chargers ultimately falls to the property owner or 3rd party owner-operator charging network. When the station owner and the station user are not the same entity, LCFS credits should be allowed to be claimed by the station owner-operator, to defray the costs of such an investment in the multi-family context.
- **Shared infrastructure.** Residents of multi-family housing struggle to install their own dedicated chargers due to the shared nature of electrical infrastructure. It is often infeasible for a single dedicated space in a separated parking area to install a charger without significant construction and electrical work, which may include adding new electrical service, conduit, trenching, and upgrading a panel. Shared electric infrastructure, even when it serves dedicated charging spaces, raises costs beyond what a single resident may be willing to pay. This circumstance creates a need for a single entity - the property owner or 3rd party owner-operator charging network- to make the investment to own and operate stations on behalf of residents, justifying broader eligibility for LCFS.
- **Split decision-making authority.** Regardless of the parking arrangement, the shared nature of electric service upgrades for multifamily residences splits decision-making responsibilities across many stakeholders. Eligibility for LCFS would encourage investment in

stations on behalf of residents to circumvent these challenges; decision-making is simplified if costs are reduced and a single entity is willing to make an investment on behalf of the group.

EVCA believes CARB's intention is to empower more multi-family residences to invest in charger access for use by residents. To better support the goal, EVCA respectfully urges CARB to amend the Proposed Regulation to allow all non-residential chargers at multi-family residences to directly claim credits from the LCFS program, regardless of parking arrangement.

We appreciate the opportunity to submit comments on this matter. Thank you for your consideration.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association