

February 20, 2024

Rajinder Sahota, Deputy Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: PG&E Comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulation

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment in response to the California Air Resources Board's (CARB) release of Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation for public comment on January 5, 2024. The LCFS program has been a vital part of California's decarbonization strategy and will continue to be critical in the State's path towards carbon neutrality. Given the importance of this program and the potentially far-ranging consequences of the proposed amendments, PG&E appreciates the extension of the rulemaking timeline to allow sufficient time to ensure all stakeholder input is considered, while still prioritizing completion of the rule by this summer. There are a number of important policy and technical details that all parties could benefit from additional engagement on.

PG&E's remaining comments are organized into the following sections:

- I. Overall support for the LCFS amendments
- II. Electricity holdback programs
 - a. 50% utility contribution
 - b. Holdback project list
 - c. 75% equity requirement
 - d. Grid-side investments
 - e. Equity administration
 - f. Equity community definition
- III. The California Clean Fuel Reward Program
- IV. Third-party verification for electricity pathways
- V. Biomethane crediting

I. Overall Support for LCFS Amendments

PG&E supports the increase in program stringency through a near-term step down, increased 2030 and 2045 benchmarks, and the creation of an automatic acceleration mechanism.

PG&E continues to support California's ambitious climate and air quality goals and believes the LCFS program is an important and central tool for achieving them. We are excited to see CARB's leadership in refining the LCFS program to maximize its impact on decarbonizing the transportation sector.

Over the past decade, the LCFS has been remarkably successful in supporting the transition to cleaner transportation fuels, and in doing so, has reduced climate change pollutants as well as localized air and toxic pollutants that adversely impact communities and public health. Moreover, the program has served as a catalyst for billions of dollars of investments in clean fuels, infrastructure, and growing industries that have made a profound impact within California.

CARB's proposed amendments are critical to carrying out the 2022 Scoping Plan for Achieving Carbon Neutrality, which charted a path to reach carbon neutrality by 2045. Importantly, credits for low-carbon fuels will support the mobile source regulations that are driving the transition to zero-emission vehicle (ZEV) technology identified as necessary in the Scoping Plan, such as the Advanced Clean Cars II and Advanced Clean Fleets regulations.

PG&E supports CARB's overarching proposal to strengthen the Carbon Intensity (CI) reduction benchmarks in LCFS both pre- and post-2030 in support of the Scoping Plan, and specifically the 30% reduction in overall fuel CI by 2030 and 90% reduction in fuel CI by 2045 from a 2010 baseline. This is critical in order to stabilize credit prices and balance supply and demand in the LCFS market, as well as providing stakeholder and market certainty. We also support a step-down reduction in the CI benchmark of at least 5% in 2025 to increase the stringency of the CI target, sending an important near-term signal to accelerate investment in cleaner fuels.

PG&E also appreciates the inclusion of a proposed Automatic Acceleration Mechanism (AAM) which will help support market stability in the event that transportation fuel decarbonization outpaces deficit generation in the program. Program success or overperformance should not destabilize the market, and the AAM can prevent such a dynamic from reoccurring.

II. Electricity Holdback Programs

A. Utility Base Credit Allocations

PG&E supports and believes the 50-50 base credit allocation requirement between utility holdback programs and the statewide program will help support utility-specific EV barriers, especially for hard-to-electrify communities.

PG&E supports the overall proposed updates to residential base crediting for electric vehicle (EV) charging and the adjustment to the percentage of base credits that can support utility “holdback” programs. Specifically, PG&E supports the modification of the contribution required from large utilities to a 50-50 split of credits supporting holdback programs and the statewide California Clean Fuel Reward (CCFR) program. PG&E participates in the LCFS program on behalf of our residential EV customers who use the electricity we deliver as a low-carbon transportation fuel, and the revenue from the credits we receive goes back to customers (either through holdback programs or the CCFR program), not the utility itself.

This important adjustment will enable better support of programs addressing market gaps specific to each utility's service territory and unique customer barriers. For example, there are significant differences in EV adoption and customer barriers between an urban municipal utility, a rural co-op and a larger investor-owned utility (IOU) due to differences in housing stock, vehicle use cases, and medium- and heavy-duty traffic, amongst other variables. This rebalancing between the statewide and utility-driven programs directly enables more creative, focused interventions on community-specific barriers which are essential for equitably driving the transportation electrification market forward.

Additionally, electric utilities are subject to extensive reporting and compliance requirements, ensuring that the distribution of LCFS proceeds is open and transparent. We have a duty to serve all customers, including populations that have been slower to adopt EVs such as those residing in disadvantaged communities (DAC) and multi-family residences (MFR). Residents of DACs and MFRs are utility customers, and as such the utilities are incentivized to assist those customers in transitioning to electric transportation.

To date, PG&E has provided over \$100 million in EV rebates through our utility holdback programs (separate from the statewide CCFR program). Our portfolio now includes rebates for used EVs and home charging options, charging installation for MFR and small businesses, and managed charging in High Fire Threat Districts. Three of our four holdback programs focus on low-income customers and DACs.

Over the coming decade we anticipate that LCFS will continue to provide revenue that can meaningfully help remove barriers to EV adoption, beyond vehicle rebates, and especially for hard-to-electrify communities. CARB’s proposed base credit allocation changes are critical to continue and expand these important programs, including into critical new areas such as ZEV infrastructure support for medium- and heavy-duty ZEVs, and building out distribution system capacity to support rapidly growing EV loads. Importantly, this base credit allocation allows us to do all of this without passing those program and infrastructure costs onto our customers, significantly helping to support market transformation, EV equity, and downward rate pressure simultaneously.

B. Holdback Project List

To minimize confusion and competing interpretations, CARB should have a single project list for holdback projects and clarify that certain project types are considered equity regardless of their geographic location.

The current LCFS regulation includes one project list for equity projects only, and the proposed amendments expanded this to two separate project lists – equity projects must come from the equity project list, and non-equity projects can come from the non-equity project list but it is not exclusive. This approach provides more certainty on the types of electrification projects CARB views as priorities both in and out of equity communities, but it also adds confusion: are rebates for purchasing a pre-owned EV (included on the equity list) also valid for non-equity customers? What if a program to avoid panel upgrades (included on the non-equity list) wants to provide equipment at no cost to low-income customers?

A single project list that *must* be used for equity projects, in addition to meeting the definitions of customers/communities served, and *may* be used for non-equity projects is more straightforward and minimizes opportunity for conflicting interpretations. This provides certainty on expectations around CARB’s priorities while still allowing flexibility for utilities to propose non-equity programs that are best suited to their specific territories. In addition, we understand from discussions with CARB staff that electrification of medium- and heavy-duty vehicles should be considered equity regardless of whether the vehicles are domiciled in an equity community. PG&E supports this, due to those vehicles contributing to air pollution benefits in the communities they drive through, which may be far from the locations they are domiciled or charged.

Finally, PG&E recommends specifically allowing panel and service upgrades in the equity project list.¹ PG&E has heard repeatedly from equity advocates and community-based organizations that many low-income customers live in older housing stock with smaller electric panels and/or outdated wiring, and panel upgrades – which can be expensive, time-consuming, and daunting – are required before many customers can even consider electrification.

The comment letter from CalETC, of which PG&E is a member, includes an appendix with suggested regulation language on how to accomplish these recommendations.

C. 75% Equity Requirement

PG&E can be supportive of increasing the equity requirement to 75% for large IOUs if there is definitional alignment with the CPUC for all aspects of the requirement, not just the percentage.

¹ i.e. § 95483. (c)(1)(A)(5)(a)(iv), added text underlined: Additional rebates and incentives for low-income individuals beyond existing local, federal and State rebates and incentives for: purchasing or leasing new or previously owned EVs; installing EV charging infrastructure in residences, including panel and service upgrades, and offsetting costs for residential or nonresidential EV charging.

While increasing the equity requirement from 50% to 75% in CARB’s draft amendments appears to align with the California Public Utility Commission’s (CPUC) 2020 LCFS decision requiring 75% of each IOU’s annual holdback spend to go to equity projects, CARB and the CPUC currently measure progress against that metric in very different ways.² CARB counts percent of proceeds earned in a calendar year, which was clarified by guidance document to include percent of proceeds either spent or encumbered (i.e. budgeted or set aside) to an equity program. The CPUC counts spend that occurs during the calendar year, regardless of when the credits were earned. Though this may seem like semantics, it means that PG&E reports entirely different data to substantiate compliance to each agency in their annual reports. To CARB, PG&E reports current-year proceeds encumbered or budgeted to be used for the next year – in other words, the next year’s equity budget. To the CPUC, PG&E reports what was spent on equity in the current year.

In addition, many real-life scenarios exist that make the proceeds vs. spend accounting further diverge. For example, underestimating the amount of proceeds that will be received leads to underspending relative to actual proceeds – even if spending is at 75% of what the forecasted proceeds are, it may be lower than 75% against actual proceeds. Thus, underestimating the credit price – which utilities have no control over and can be difficult to predict – will cause the utility to underbudget and therefore underspend relative to a proceeds-based target.

It is critical that both CARB and the CPUC adopt the same method of tracking compliance for the same programs funded with the same credits. This ensures that the data being reported to the agencies aligns and reduces the amount of time spent calculating two versions of compliance metrics. It also eliminates the possibility of a scenario arising where the calculations diverge enough that compliance is not possible with both agencies and a utility must pick whether to comply with the CPUC or with CARB.

PG&E recommends that both CARB and the CPUC track holdback equity compliance based on holdback program spend within the calendar year.³ This method has several major advantages over proceeds-based tracking (which is CARB’s current requirement):

- Spend is within utilities’ control and thus creates more accountability. The utilities have no control over credit prices or credits generated, which can push a utility out of compliance even if it has acted reasonably.
- Spend encourages prudence when funding is being used, whereas budgeting (proceeds encumbered) may be based on ideal situations or inaccurate forecasts.

² D.20-12-027, Ordering Paragraph 1 requires that 75% LCFS holdback expenditures must meet the equity project requirements in the CARB LCFS regulation in 2024 and afterwards.

³ i.e. 75% of a utility’s holdback program spend in a calendar year must serve priority communities or low-income customers.

- Spend can handle “banked” proceeds from prior years. Tracking only current-year proceeds can lead to an inaccurate view of the whole portfolio if funding is coming from prior years.⁴
- Spend allows for better accounting of LCFS overhead costs, which are not program-related and therefore cannot be accounted as equity or non-equity.⁵ Under proceeds-based tracking, overhead costs must be treated as non-equity, reducing the amount of funding that can be used to support broad electrification projects. With spend-based tracking, overhead costs are removed from the calculation so that only program spend is used to calculate compliance.

D. Grid-Side Investments

PG&E recommends that grid-side investments that support both light-duty and medium/heavy-duty EV charging be eligible for equity spending requirements, if serving projects in an equity community

PG&E appreciates and supports CARB’s proposed expansion of its Holdback Credit Pre-Approved Project Types list to include grid-side investments. With state policy rapidly accelerating transportation electrification (TE), not only with light-duty vehicles but also with medium- and heavy-duty (MD/HD) vehicles, the need for grid investments to support electrification is growing. PG&E anticipates a significant increase in these EV loads over the next two decades, accelerated by major policy drivers and regulations from CARB and the State.

PG&E believes grid and infrastructure upgrade work needed to support California’s TE goals should not be borne by utility ratepayers alone, and that alternative sources of funding, such as LCFS revenues, can represent an opportunity for PG&E to support and accelerate additional TE-related projects in priority communities. Accordingly, PG&E appreciates CARB’s proposed revisions which, with corresponding CPUC regulatory changes, would allow for this.

This said, we believe it is important to have a broad definition for grid-side investments that encapsulates both light-duty and MD/HD loads. CARB’s current proposal would limit grid-side investments that can count towards the high 75% equity spending requirement to only those supporting MD/HD vehicles. The current language would unnecessarily limit and complicate grid planning, program development, and the ability to scale such a program to maximize downward pressure on rates and positively impact affordability, a significant equity issue. It is

⁴ For example, if a utility earned \$50,000 in proceeds in years 1 and 2, and in year 2 spent \$50,000 on equity programs and \$50,000 on non-equity programs, then it would appear that their year 2 equity compliance was at 100% compared to current-year proceeds, even though the spend was at 50%.

⁵ Overhead costs are costs associated with participating in LCFS regardless of whether the utility is offering any programs. They include broker fees or staff time from selling credits, quarterly & annual reporting, analysis and costs of transferring funding to the CCFR, utility participation in the CCFR Steering Committee, and verification. These costs are different from program administration, which include contracting, invoicing, performing income validation, reviewing applications, and mailing rebates.

possible that a grid side capacity project may not be located in or entirely located in an equity community, but that capacity project is indeed serving TE projects in an equity community.

Additionally, PG&E's pipeline of upstream distribution capacity needed to serve EV loads is currently driven by public DC fast charging, primarily intended for light-duty, rather than fleet or MD/HD charging. Moreover, light-duty DC fast charging is critical to supporting EV equity, as those who cannot charge at home disproportionately rely on such charging as their primary charging option.⁶ Finally, in the scenario where proactive grid-side capacity projects are possible and prudent in relation to forecasted locational EV demand, the ability to trace that to any specific customer project or type/category of project (i.e. light-duty versus MD/HD) becomes more tenuous. An unnecessarily narrowly worded rule could foreclose on the possibility of developing such projects to minimize future energization delays for larger EV loads using non-ratepayer funds.

For these reasons, PG&E recommends that the definition proposed to be used under "Other Holdback Projects," which is "Investments in grid-side distribution infrastructure necessary for EV charging," should also be the definition for such investments if it is a "Holdback Credit Equity Project" – in other words, that equity spending should not be limited to MD/HD charging. Whether or not the investment counts against a utility's equity holdback spend requirement should be based on whether the grid-side investment is serving EV projects in an equity community, as the rules ultimately define it, rather than if it narrowly supports MD/HD vehicles.

E. Equity Administration

CARB should revert to a 10% cap on equity administration spend for holdback programs, expand the definition of administrative costs to include program-specific costs aligned with how utilities report for other regulators, and clarify that this excludes start-up costs and marketing, education, and outreach (ME&O) costs.

Administrative costs are not defined in the LCFS regulation, but Guidance 20-03 provides a very narrow definition focused on the utility's overall administration rather than program-specific administration, such that most costs utilities must report as program administration to other regulators are excluded.⁷ PG&E views administrative costs as the costs associated with managing a program and ensuring good stewardship of the funding. This includes activities that

⁶ See, for example, <https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf> at p.2-3.

⁷ LCFS Guidance 20-03 defines administrative costs as including:

- Salaries, wages and benefits of employees who perform administrative functions, including EDU management, payroll, personnel, accounting, and budgeting;
- facility and occupancy costs directly associated with administrative functions;
- Computer support services;
- Training, travel, and licenses directly associated with administrative functions;
- Taxes, interest, and general insurance; and
- General expenses.

may fit in CARB's original definition, such as the program manager's time spent running the program, invoicing, and regular check-in meetings; however, it also includes activities that are directly related to providing incentives, such as development and maintenance of a website and online application, reviewing customer applications, conducting income validation, implementing fraud controls, and issuing checks.

A cap of 5% administration may be adequate for the narrowly-defined set of criteria in the current Guidance 20-03, but the definition does not align well with the much more expansive set of criteria that PG&E and other utilities use when reporting administrative costs to regulators like the CPUC for most clean energy programs. Maintaining the guidance document's definition would lead to PG&E reporting two different sets of administrative cost numbers to CARB and the CPUC. Instead, CARB should adopt the standard, more expansive definition of program administrative costs (including utility administration, third-party implementer administration, and non-incentive implementation costs) and revert the cost cap to 10%. Ten percent of costs is the industry standard for utility clean energy programs across the United States, and is what PG&E typically maintains for transportation electrification and other clean energy programs.

PG&E notes that a 5% cost cap with the expanded definition is not tenable for utility holdback programs, even if it may be for very large, established statewide programs. This is because much of the program-specific administrative costs are required regardless of program size. For example, PG&E had a former program that provided 150,000 rebates to the general population and is currently implementing one expected to reach around 5,000 income-qualified customers. Despite the massive size difference, the programs both required a similar website and in-house application (and because of the income qualification, the second, smaller program's application was more complex and therefore more expensive to build). Equity-focused programs require additional verification methods to ensure the funds are making it to customers that need the funding. Income validation adds substantial time and cost to each rebate application given the lack of standardized methods for accomplishing it, and the extra required details often lead to far more customer support time.

In addition, CARB should clarify that start-up costs are not included in the 10% cost cap, to align with how costs are defined for the statewide CCFR program. Startup costs occur before any incentives have been paid and are therefore nearly 100% administrative. As a result, it is almost impossible to comply with any administrative cost cap the year a program is being set up.

Finally, CARB should clarify that program-related ME&O is important for program success and separate from administrative costs. In its proposed amendments, CARB removed ME&O as a standalone equity project type, which PG&E generally agrees with. The CPUC similarly disallows general EV marketing but acknowledges the need to alert customers about the existence and value of the incentive programs. However, the language used in the Purpose and Rationale appendix is broader than this and seems to say that utilities are not allowed to use any

holdback proceeds on marketing at all, rather than just on general marketing not tied to customer incentive programs.⁸

ME&O is a critical part of program success, especially for programs serving equity customers. PG&E has partnered with several community-based organizations (CBOs) to provide education about our EV programs in ways that most align with how the local community receives its information, answer questions in-person and in-language, and support customers in applying to the programs. Their work has been invaluable and must be allowed to continue for LCFS-funded programs. ME&O serves a different function from administrative costs, however, and should not be included as part of the 10% cost cap. This ensures that programs are not forced to forego ME&O to equity communities to pay for more costly equity program components, such as income validation costs or customer support.

F. Equity Community Definition

PG&E supports the revised definition of an equity community to better align with the CPUC and AB 841.

PG&E supports CARB's proposed revision of its equity community definition to include federally recognized tribes, as well as a community in which at least 75% of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program. This expanded definition will incentivize investments into these important communities and, importantly, help to align CARB's equity community definition with that used by the CPUC and as defined by the Legislature in AB 841 (Ting, 2020).

III. California Clean Fuel Reward

PG&E recommends CARB gather additional stakeholder input on the pivot of the statewide clean fuel reward program from a light-duty vehicle rebate to a targeted MD/HD rebate.

PG&E is still evaluating CARB's proposed changes to the CCFR program. The release of the 45-day draft regulatory language represented the first time implicated stakeholders became aware of what is a rather significant change to this program, changing it from a universal new light-duty electric vehicle rebate to a rebate focused on MD/HD vehicles that are not subject to the Advanced Clean Fleets Regulation. While PG&E agrees that there is a need to incentivize this category of trucks, it is unclear to us how this program would exist and interact with other similar incentive programs for such vehicles. Moreover, there remains significant need to

⁸ Appendix E, "Purpose and Rationale of Proposed Amendments for the Low Carbon Fuel Standard Requirements," pg 15 states "Staff is also proposing the removal of holdback credit proceeds for Marketing, Education, & Outreach for electric vehicles."

incentivize light-duty vehicle purchases, in particular for income-qualified customers, which is what the CCFR was in the process of being revised to do. PG&E believes it is far too early to declare victory in the state's efforts to equitably accelerate the light-duty vehicle market.⁹

Moreover, the revised program mandate that has been proposed would likely represent a significant wealth transfer from the residential, light-duty customers that exclusively generate the base utility LCFS credits to commercial MD/HD customers. In addition to this customer class and vehicle type wealth transfer, the revised program would also disproportionately benefit the parts of the state where the significant clusters of these medium- and heavy-duty trucks exist, representing a geographic wealth transfer as well.

For these reasons, PG&E highlights the importance and need to gather stakeholder feedback on such a significant program change, in particular from community-based organizations and equity groups, and suggests this should be a significant factor in the decisions around the program's ultimate direction. Should this wholesale change take place, it would heighten the need for and highlight the critical importance of utility holdback programs in supporting the light-duty market, especially for equity customers that may otherwise be left behind.

IV. Third-Party Verification for Electricity Pathways

PG&E could be supportive of adding electricity pathways to verification if revisions to accommodate the unique, distributed nature of EV charging are made.

Firstly, PG&E believes CARB should exempt residential and non-residential on-road electricity pathways from Fueling Supply Equipment (FSE) site visits except in cases where there is a reasonable concern about accuracy. Commercial and residential EV charging stations are largely standardized pieces of equipment subject to existing accuracy regulations.^{10,11,12} Requiring site visits will yield very little value over actual usage data for most revenue-grade networked charging stations, where the data is used to bill customers and is provided digitally by the EV Service Provider (EVSP). In addition, charging stations represent a highly distributed infrastructure with a large number of units made up of a small number of equipment models. Even though California is still in the early majority for EV adoption, there are already an order of magnitude more public charging stations than there are gas stations in the state, and that

⁹ As of the end of 2022, only 4% of California's light-duty vehicle population is a zero-emission vehicle per the California Energy Commission's Zero Emission Vehicle and Infrastructure Statistics dashboard:

<https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics>

¹⁰ Utility meters are certified to ANSI C12 standards by Nationally Recognized Testing Labs (NRTLs)

¹¹ California Department of Food and Agriculture's Division of Measurement Standards (DMS) regulates EV chargers for metering accuracy: https://www.cdffa.ca.gov/dms/pdfs/regulations/EVSE-OAL_EndorsedLetter-and-FinalText.pdf

¹² Each California county's Department of Weights and Measures conducts inspections to enforce the DMS requirements, paid for through county device registration fees:

https://www.cdffa.ca.gov/dms/docs/publications/2023/2023_Combined_BPC.pdf

number will only rise. PG&E alone has around 400 charging stations – all from one EVSP, and nearly all the same model – at 100 offices across Northern California for our employees to use.

As § 95501 (b)(3) seems to indicate, requiring site visits to each facility with fueling equipment – i.e., a charging station – represents a massive time requirement and cost for very little benefit. Residential metered charging is an even larger problem as there are already hundreds of thousands of EVs being reported to CARB, and reporting may be done either by vehicle telematics or charging station. Conducting site visits to even a fraction of those sites is nonsensical – if the data comes from telematics, would the verifier just be checking there is an EV in the garage? – and intensely disruptive to the vehicle owner, again for little to no benefit over the raw usage data.

Second, CARB should create an exemption for very small credit generators. Level 2 charging stations are highly distributed and often owned by fleets, workplaces, multifamily buildings, grocery stores, and other businesses rather than a single entity with a large network. If a multifamily building is only generating a dozen credits per year from its charging stations, then requiring verification – even if deferred – will likely wipe out all of their credit proceeds and negate the benefits of participating in LCFS. CARB might consider this as a smaller credit cap within the 6,000-credit cap used for deferment (i.e., entities that generate fewer than, say, 2,000 credits are exempt from verification; entities that generate between 2,001 and 6,000 credits qualify for deferment).

Finally, CARB should clarify in §95500(c)(2)(B) that only credits subject to verification are counted towards the 6,000-credit cap used to qualify for deferred verification (or exemption as recommended above). The overwhelming majority of utility credits come from estimated residential charging, which CARB calculates on behalf of each utility and are therefore not subject to verification. However, including all credits in the LCFS Reporting Tool system as the current definition states means that many utilities will be ineligible for deferment even if they are only generating a few dozen credits from charging at their offices.

V. Biomethane Crediting

PG&E urges CARB to develop an alternative incentive program or policy lever to support the transition of biomethane to hard-to-decarbonize sectors.

As noted in CARB staff’s Initial Statement of Reasons (ISOR) report on the proposed LCFS amendments, PG&E agrees that capturing methane from California’s methane sources is critical for achieving the State’s climate targets and that actions to reduce methane emissions will provide immediate benefits. The 2022 Scoping Plan also identifies a long-term role for biomethane in decarbonizing California’s energy use, either through the production of renewable hydrogen or for use in non-transportation sectors. To this end, CARB is proposing to phase out crediting for biomethane used in CNG vehicles after 2040. While PG&E supports this long-term

transition for biomethane to hard-to-decarbonize sectors, CARB should ensure that this proposed phase-out from the LCFS program does not stymie the growth of critical methane capture projects in the near-term, which can take many years for design, build, and connection.

Conclusion

PG&E looks forward to continuing our collaboration with CARB staff and public stakeholders on potential amendments to the LCFS Program that will best support the State's climate goals.

Sincerely,

/s/

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