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

Re: Weave Grid, Inc. Supportive Comments in Response to Proposed 15-Day Changes: 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 15-Day Changes to the Proposed Low Carbon Fuel Standard (LCFS) Amendments posted on August 12, 2024.

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 EV driver charging behaviors and vehicle-grid integration. 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 further proposed amendments to the LCFS regulation. LCFS plays an essential role in supporting California's ambitious transportation electrification and climate goals. WeaveGrid largely supports the regulation and the proposed amendments outlined in December 2023 and August 2024.

A. WeaveGrid commends CARB for retained language on vehicle-grid integration (VGI).

WeaveGrid is strongly supportive of the retained proposed amendments from the December 19, 2023 proposed amendment update within Section 95483(c)(1)(A)5.b.[1] As EV adoption in California increases, California needs to adapt the grid accordingly. WeaveGrid appreciates 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 customers.[2] VGI enables cleaner charging by increasing renewables integration and providing a signal for drivers when it is cleanest to charge.[3] 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.

Increasing the use of VGI in California is critical to meet clean electricity, clean transportation, and affordability goals. Electrical distribution utilities (EDUs) are the key player to enable effective VGI. More sophisticated VGI includes managing EV charging based on ever-changing grid conditions. To enable cheaper and cleaner charging, grid-aware inputs are required for VGI. For example, renewable energy curtailments can be reduced by charging more vehicles when renewable energy generation is abundant. Another example is avoiding charging when there is higher grid congestion at a local distribution or bulk system level. Among the many approaches to VGI, EDUs are best positioned to incorporate relevant grid signals into their VGI projects. It is for this reason that we emphatically support the VGI-related pre-approved uses for EDU holdback credits.

B. WeaveGrid strongly recommends clarifying and streamlining the EDU holdback credit requirements and pre-approved uses.

WeaveGrid is a leading technology provider of VGI. Our VGI deployments through public utility commission-approved utility programs and government-selected grant opportunities within and outside of California often require or encourage a strong focus on equity. We

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[1] Appendix A-1 Proposed Regulation Order, Section 95483(c)(1)(A)5.b., p. 46, https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/15day_atta-1.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] CPUC Decision 20-12-029.

have launched and are launching programs in partnership with community-based organizations (CBOs), with important disadvantaged community (DAC) and low-income community enrollment targets, and with tracking of meaningful community benefit metrics. As such, we do not see VGI efforts at odds with equity efforts. In fact, we think that these two categories of focus should be seen as complementary: Equity communities can benefit from greater access to VGI technology.

As currently written in Sections 95483(c)(1)(A)5.a.[4] and 95483(c)(1)(A)5.b.[5] under "Restrictions of Use of Holdback Credits," equity holdback projects can be interpreted as separate and distinct from VGI holdback projects – this can inadvertently disallow equity-focused VGI projects. WeaveGrid encourages CARB Staff to clarify and streamline this language. We recommend combining the list of required and pre-approved uses of holdback credits. As explained above, meeting the 75 percent required equity spend does not need to be at odds with VGI deployment.[6] In effect, this would also mean expanding what is included as a qualified Holdback Credit Equity Project. Currently, the LCFS regulation has a relatively narrow set of projects that qualify as equity projects, limiting the scope of what EDUs can do with this funding. In our view, any transportation electrification efforts that meaningfully benefit disadvantaged, vulnerable, and underserved communities should be eligible for LCFS funding. This is a best practice in line with what we see from other commissions, utilities, and federal and state agencies.

Moreover, as CARB finalizes amendments to the LCFS program, there is a handoff to the California Public Utilities Commission (CPUC), who also regulates the use of the holdback revenue that EDUs receive. Clearer language around the use of holdback credits upfront in the CARB regulation allows the CPUC to review and approve utility programs that best fit local communities and do not include needlessly limiting restrictions. Given the extensive regulatory guidance and approval process for EDU holdback credits, we recommend streamlining the language in the Restrictions of Use of Holdback Credits section by consolidating the required and pre-approved uses, as outlined above, so that there is greater clarity and more flexible use of credits to benefit communities across California.

C. WeaveGrid offers strong support to increase the stringency of the program.
WeaveGrid applauds CARB's proposed amendments to the carbon intensity benchmarks to increase the stringency of the program by bringing LCFS credits and deficits in balance.[7] To maintain the long-term effectiveness of LCFS, we believe at least a 9 percent step-down is required in 2025. As stated previously, LCFS is a critical funding source in the state for

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[4] Appendix A-1 Proposed Regulation Order, p. 44.
[5] Appendix A-1 Proposed Regulation Order, p. 46.
[6] Appendix A-1 Proposed Regulation Order, p. 44.
[7] Appendix A-1 Proposed Regulation Order, p. 66.

transportation electrification efforts, so maintaining reliable credit prices is necessary. Given the prominent role that LCFS plays, we are highly supportive of CARB's efforts to strengthen compliance measures, which can ultimately increase the program's success in reducing transportation emissions and promoting cleaner fuels.

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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