



August 27, 2024

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments of Kaluza on the Proposed 15-Day Changes to the Proposed Amendments to the Low Carbon Fuel Standard**

Dear Chair Randolph, Honorable Board Members, and California Air Resources Board Staff,

Kaluza appreciates the opportunity to provide comments on the California Air Resources Board's ("CARB") Proposed 15-Day Changes to the Proposed Amendments to the Low Carbon Fuel Standard ("LCFS"). We support the modifications being proposed by staff in these amendments, recognizing the vital role they play in strengthening the LCFS program and driving California towards the use of cleaner fuels and decarbonized transportation electrification.

**Introduction**

Kaluza is a fully cloud-native SaaS company that enables energy utilities to engage their customers in the clean energy transition. From revolutionizing billing to smart electric vehicle charging, Kaluza's technology is empowering some of the biggest energy suppliers to better serve millions of customers. Powered by Kaluza's meter-to-cash platform that automates the customer lifecycle from onboarding to billing and customer care, utilities can invest in innovating for tomorrow's customers and drive decarbonization with smart, low carbon technologies that not only reduce energy bills, but also lay the foundations for a more flexible energy system.

Kaluza's Flex software platform powers a range of market-leading managed charging programs, including the world's largest residential V2X pilot and a scaled managed charging program on behalf of the UK's third largest energy retailer that has grown from 200 EVs to 15,000 in less than a year.

Scaling its load management and smart charging solutions globally, Kaluza is working with a number of leading automotive companies. These collaborations are focused on developing cutting-edge direct-to-vehicle solutions able to intelligently manage the storage of green and affordable electricity across millions of EVs and reward customers,



without the need for separate smart charging hardware. Kaluza is proud to be a B Corp-certified business with US employees in California, Texas, New Jersey, and Washington DC in addition to global offices in London, Bristol, Edinburgh, Lisbon, and Melbourne.

## Comments

Kaluza strongly supports utilizing utility holdback funding for all Vehicle-Grid Integration (VGI) projects and load management software outlined in section 95483(c)(1)(A)5b. Specifically, the inclusion of funding for investments in grid-side distribution infrastructure, support for vehicle-grid integration projects, and incentives to encourage driver participation in managed charging and vehicle-to-grid applications aligns with our mission to optimize energy systems for a sustainable future. These initiatives are critical to enhancing grid resilience, reducing costs for electricity ratepayers, and supporting the widespread adoption of electric vehicles (EVs) across California as well as moving towards a more customer centric energy system.

While Kaluza acknowledges the importance of focusing on medium- and heavy-duty vehicles as part of the broader decarbonization strategy, we believe that funding light-duty vehicle projects should remain a priority as well. To this end, we support the allocation of base credits to Original Equipment Manufacturers (OEMs) as a means to provide additional funding for the Zero-Emission Vehicle (ZEV) transition. By enabling OEMs to use these credits for projects such as installing EV charging infrastructure, subsidizing EV charging plans, and promoting VGI initiatives, California can ensure a comprehensive and balanced approach to transportation electrification.

As a certified B-Corp, Kaluza actively collaborates on projects that prioritize equity, frequently partnering with community-based organizations. We are seeing this equity-focused approach become increasingly common in utility programs and pilots across the U.S. These initiatives are crafted to ensure substantial participation from disadvantaged and low-income communities, proving that VGI and equity objectives can effectively align. We believe that residents in DAC areas are the ones who would benefit from VGI and clean air the most.

However, the current separation of equity projects from VGI initiatives in Sections 95483(c)(1)(A)5.a. and 95483(c)(1)(A)5.b. could unintentionally hinder the development of equity-focused VGI projects. We urge CARB to revise the language to combine the lists of required and pre-approved uses of holdback credits, clearly stating that VGI projects benefiting disadvantaged communities qualify for funding. Furthermore, the criteria for equity projects under the LCFS are currently too restrictive, limiting what



Electric Distribution Utilities (EDUs) can accomplish. By broadening these criteria, a wider range of transportation electrification efforts that serve underserved communities could receive support, helping EDUs to design programs that better align with CPUC guidelines.

### **Conclusion**

In summary, Kaluza endorses the proposed changes and urges the adoption of these amendments to enhance the effectiveness of the LCFS program. We believe that these adjustments will provide the necessary support to advance managed charging technologies, promote VGI projects, and ultimately contribute to California's ambitious clean energy and transportation objectives.

Thank you for considering our comments.

Respectfully submitted August 27, 2024

Samuel Goda  
Regulatory & Government Affairs  
Manager  
Kaluza US LLC  
1701 Rhode Island Ave NW,  
Washington, DC 20036  
samuel.goda@kaluza.com