

BMW Group

August 27, 2024

SUBMITTED ELECTRONICALLY: <https://ww2.arb.ca.gov/applications/public-comments>

Clerks' Office

California Air Resources Board

1001 I Street

Sacramento, California 95814

Subject: Comments on Low Carbon Fuel Standard – 15-Day Notice Comments

BMW of North America, LLC (BMWNA) appreciates the opportunity to comment on the proposed changes to the Low Carbon Fuel Standard program released by the California Air Resources Board (CARB) on August 12, 2024. BMWNA has been a participant in the LCFS program as a generator of incremental credits since 2019. The LCFS program has been an important contributor to helping make transportation fuel more sustainable. The proposed changes demonstrate CARB's continued commitment to improving the LCFS program. BMWNA supports the changes proposed by CARB.

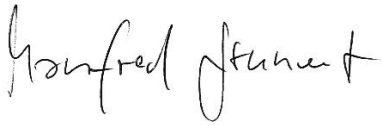
As a member of the Alliance for Automotive Innovation (Auto Innovators), BMWNA concurs with the comments submitted by the Auto Innovators. BMWNA supports the opportunity for OEMs to receive a portion of the base credits from residential electric vehicle charging, as proposed by CARB. As stated by the Auto Innovators, allocating credits to OEMs is critical in supporting the significant investments OEMs need to make in order to meet CARB's electrification targets. CARB can support the distribution of base credits to OEMs by providing greater clarity into how it determines what portion of credits to allocate to OEMs and what methodology will be used to allocate credits among OEMs. Additionally, the Auto Innovators suggest language modifications that would allow the California Clean Fuel Reward (CCFR) to continue to be administered by utilities if CARB decides to continue allocating sufficient base credits to utilities. BMWNA supports this modification.

In addition to the Auto Innovators comments, BMWNA also suggests that CARB use this rule change as an opportunity to modify the dairy biodigester pathway to make it easier for small dairies to participate in the LCFS program. BMW currently generates LCFS credits in partnership with the Straus Dairy Farm, a small dairy farm which generates electricity through a biodigester. The pathway requirements for dairy biodigesters include data and verification requirements that are onerous for small dairy operations. In order to support the participation of more small dairies, CARB should allow small dairies to opt-in the LCFS program under a fixed carbon intensity score with simplified data and verification requirements, as an alternative to current dairy biodigester pathway.

BMWNA supports CARB's modifications to the LCFS and looks forward to working with CARB to continue to improve the program. Thank you for considering BMW NA's comments during this rulemaking. We look forward to working with CARB staff and board members. Please feel free to reach out with any questions you may have.



Sincerely,



Manfred Grunert
Vice President, Government Affairs and Communications
BMW of North America, LLC

Thomas Ruemenapp
Vice President, Engineering
BMW of North America, LLC

BMW of North America, LLC

BMW of North America, LLC has been present in the United States since 1975. Rolls-Royce Motor Cars NA, LLC began distributing vehicles in 2003. The BMW Group in the United States has grown to include marketing, sales, and financial service organizations for the BMW brand of motor vehicles, including motorcycles, the MINI brand, and Rolls-Royce Motor Cars; Designworks, a strategic design consultancy based in California; a technology office in Silicon Valley and various other operations throughout the country. BMW Manufacturing Co., LLC in South Carolina is the BMW Group global center of competence for BMW X models and manufactures the X3, X4, X5, X6 and X7 Sports Activity Vehicles as well as the new BMW XM. The BMW Group sales organization is represented in the U.S. through networks of 350 BMW passenger car and BMW Sports Activity Vehicle centers, 146 BMW motorcycle retailers, 105 MINI passenger car dealers, and 38 Rolls-Royce Motor Car dealers. BMW (US) Holding Corp., the BMW Group's sales headquarters for North America, is located in Woodcliff Lake, New Jersey. Journalist note: Information about BMW Group and its products in the USA is available to journalists on-line at www.bmwgroupusanews.com and www.press.bmwna.com.

