



August 27, 2024

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

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

Dear Chair Randolph and Honorable Board Members,

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 has separately submitted joint comments on various elements of the Proposed Regulation, this letter focuses on credits for non-residential chargers at multi-family properties, the auto-accelerated mechanism and site visits associated with CARB's proposed verification requirements for EV charging.

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.

EVCA appreciates expanding the eligibility of multi-family residences to claim LCFS credits, and respectfully encourages the proposal to also be inclusive of chargers serving dedicated parking spaces. Multi-family residences with dedicated parking arrangements face the same underlying barriers to charger deployment as properties with unassigned parking. Expanding eligibility works to alleviate challenges around property-owner and third-party owner-operator

management and maintenance costs, shared electrical infrastructure, and encourages the simplification of split decision-making authority amongst multiple stakeholders. EVCA applauds CARB's work to empower more multi-family residences to invest in charger access for use by residents. To further support this goal and minimize tracking and implementation challenges, EVCA recommends CARB allow all non-residential chargers at multi-family residences to directly claim credits from the LCFS program, regardless of parking arrangement.

Auto-Acceleration Mechanism Trigger

EVCA supports the Auto-Accelerated Mechanism (AAM) as a valuable tool to pull forward CI units from future years, helping to balance the market and prevent an excessive accumulation of credits. We recommend implementing the AAM in 2026, rather than 2027, to more effectively address near-term imbalances in the LCFS credit market and support the program's goals.

Third-party verification requirements and credit exemptions and deferred verification requirements.

In an effort to help streamline the verification process, EVCA suggests that CARB consider allowing for a desktop review process in lieu of requiring in-person site visits for annual verification services due to the large amount of charging infrastructure spread across the state. Moreover, unlike other fuel production facilities, EV chargers do not have data management systems and instead report fuel transaction data to a central charger management system - rendering site visits ineffective for assessing the accuracy of reported fuel transactions. Allowing for flexibility through a desktop review process both provides a more effective way to assess the risks of misreporting and allows for CARB to focus on the integrity of the data that is transmitted electronically. This would allow a focus on ensuring data integrity through matching reported data from charging networks.

Overall, EVCA supports CARB's proposed LCFS amendments which include expanding credit eligibility for non-residential chargers at multi-family properties, introducing the Auto-Accelerated Mechanism, and deferring verification for smaller entities. These changes will work to promote widespread electric vehicle adoption and help to enhance the effectiveness of LCFS.

Respectfully,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association