



Clerk's Office

November 5, 2020

California Air Resources Board

1001 I Street, Sacramento, California 95814

ELECTRONIC MAIL TO: <https://www.arb.ca.gov/lispub/comm2/bcsubform.php>

Re: Rivian's Comments on the Low Carbon Fuel Standard Public Workshop to Discuss Potential Regulation Provisions held on October 14 and 15, 2020.

On behalf of Rivian Automotive, LLC, ("Rivian"), I submit these comments to the California Air Resources Board regarding possible revisions to the Low Carbon Fuel Standard ("LCFS") program. Rivian supports the California Air Resource Board ("CARB") LCFS goals of decreasing the carbon intensity of California's transportation fuel, reducing petroleum dependency, and achieving cleaner air. We believe that critical to the continued success of any LCFS program that aims to reduce carbon from transportation fuel is incentivizing the behavior needed to increase the rate of purchase and the use of electric vehicles ("EVs"). Rivian makes these comments in the spirit of incentivizing the increased use of low carbon fuels by incentivizing EV sales and EV use (charging) in order to achieve California's ambitious goals (Executive Order B-48-18) of five million zero-emission vehicles on the road by 2030 and the installation of 250,000 public charging stations, including 10,000 direct current fast charging stations in operation by 2025.

Founded in 2009, Rivian is an independent U.S. company dedicated to the production and distribution of all Electric Adventure Vehicles™ – namely trucks and SUVs. These zero emission vehicles encourage consumers to enjoy the outdoors and seek adventure in environmentally friendly ways. In addition, we have a commitment with our investment partner, Amazon, to develop and produce 100,000 all electric heavy-duty class 2b and 3 trucks by 2030 as last mile delivery vans. Rivian, has a substantial presence in California, Michigan and Illinois. The R1T truck, R1S SUV, and the delivery van will go into production in 2021 in the Normal, Illinois manufacturing facility.

Rivian's Plans

As noted above, Rivian will begin delivering its first truck (R1T), full-sized sport utility vehicle (R1S) and last-mile heavy duty delivery van in 2021. These vehicles will be among the first of their respective segments, with higher sales volumes than so-called "compliance" vehicles produced solely to meet regulatory minimums. As evidence of this, Rivian has attracted a large number of vehicle preorders across the entire U.S with a vast majority of Rivian's preorder customers having never owned an EV. Rivian's EV expansion into new segments and first time EV buyers is due, in part, to the compelling capabilities offered by Rivian's pickup truck and SUV, several of which exceed the capabilities of their petroleum-powered counterparts.

In addition to vehicle delivery, Rivian intends to sell residential chargers and deploy a public charging infrastructure network beginning in 2021.

Clarifications for Uses of On-Vehicle Telematics

Rivian appreciates California's efforts to clarify the use of vehicle telematics for measuring and recording EV residential charging. To more accurately allocate LCFS credits and properly incentivize low carbon fuel use, Rivian requests that CARB clarify the hierarchy of entities that can claim incremental credit generation from both metered and non-metered residential charging. Rivian plans to have both on-vehicle and residential charger telematics capable of reporting detailed information beyond a surrogate value to what a segregated meter might provide. In addition to establishing incremental credits, the charging telematics data provided could help CARB to model unmetered residential incremental credits that are not supported by on-vehicle telematics of non-Rivian vehicles. Rivian recommends that, provided a vehicle and/or Electric Vehicle Supply Equipment ("EVSE") can provide accurate and verifiable charging data, telematics should allow vehicle manufacturers, or their designee, to make first claim to any incremental LCFS credits. Such a hierarchy would ensure the diverse participation of credit generators in the LCFS program and provide an additional incentive for private investment to the California EV market while encouraging the increased use of accurate on-vehicle telematics.

Rivian recommends that CARB reduce the geofencing requirements originally established to avoid potential double counting in LCFS guidance 19 02. As more public chargers are installed the chance of residential charging being ineligible for incremental incentives increases. Rivian asks that CARB reduce the current geofencing as discussed in LCFS guidance 19 03 appendix A. The 200-meter range should not be maintained, due to concerns over some older non-residential chargers providing less precise location data, at the expense of residential charging and vehicles offering more precise and accurate data.

Conclusion

Rivian supports CARB's LCFS program and CARB investigating potential regulatory changes including clarifying the use and role of on-vehicle telematics. Rivian recommends that CARB allow manufacturers using on-vehicle telematics to be the primary credit generators of incremental LCFS credits. Rivian also requests that CARB reduce the geofencing range as to not penalize a vehicle's ability to generate

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incremental credits with the more accurate on-vehicle telemetry.

Please let me know if you have any questions. Rivian looks forward to working with CARB on proposed changes to the LCFS program.

Sincerely,

A handwritten signature in blue ink, reading "Chris Nevers". The signature is fluid and cursive, with the first name "Chris" and last name "Nevers" clearly distinguishable.

Chris Nevers,
Director of Environmental Engineering and Policy