

October 16, 2024

Steven Cliff, Executive Director
California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: SRECTrade Comments on Proposed Low Carbon Fuel Standard (LCFS) Amendments, version October 1, 2024

Dear Mr. Cliff:

SRECTrade appreciates the work by CARB to engage stakeholders and integrate comments into the proposed amendments.

We appreciate your consideration of our comments and requests for clarification:

1. **Support updates to the Carbon Intensity Standard and Auto Adjustment Mechanism.** SRECTrade applauds CARB's amendments to tighten carbon standards and provide increased stability to the LCFS program. Additionally, we support the proposal to move the auto adjustment mechanism to a rolling four quarter trigger which will bring greater market certainty and improve responsiveness of the regulation to market supplies and demands.
2. **Changes to forklifts under the regulation**
 - a. **Support the phase-in the implementation of forklift metering requirements.** SRECTrade supports the phased in approach to forklift metering as an appropriate reflection of the complexities for forklift owners to implement the updates. We appreciate CARB's consideration of the business impacts and allowing for more time to meet these requirements.
 - b. **Suggest phase in of changes to credit generator.** The proposed updates to Section 95483(c)(4)(A) will result in changes to registrations and cause disturbance to the forklift market at the same time the industry is managing changes associated with the Zero Emission Forklift Rule. We suggest phasing in the proposed change to making the owner of the FSE the credit generator at the same time meter requirements are implemented so that re-registrations and changes to reporting can be handled at one time. This will also enable fleet owners and operators to address program changes and registration requirements at one time, rather than multiple changes and re-registrations to address the change in credit generator and change in metering registration separately.
 - c. **Clarity on implementing EER updates.** SRECTrade requests that CARB clarify when the changes to the forklift EER will go into effect as well as the associated changes to application type reporting based on forklift capacity rather than model year. This clarification will give all parties time to update their reporting systems and support a smooth transition.
3. **Clarification on changes to treatment of eTRUs.** We request CARB to provide further clarification on the proposed changes to eTRUs, including:
 - a. In Section 95483.2(b)(8)(B)(6), further define the owner of the fuel dispensing equipment (i.e. charger) as the credit generator, particularly in circumstances where the larger facility may be owned or operated by a different entity.
 - b. In the same section, please clarify if the 'equipment' referred to in the following clause is a reference to the eTRU itself, or the charger: "then it is optional to provide serial number assigned to each equipment by the OEM and the name of the OEM".
 - c. Please address the timeline for implementing these changes and intentions on transferring existing register eTRUs to the newly adopted registration guidelines.

4. **Update verification requirements for site visits to align with EV Charging.** EV Charging transactions are largely driven by data collection and management systems; these operations are meaningfully different from fuel generation facilities and should be treated at the verifiers discretion. Specifically, in cases where a central records location does not exist, SRECTrade recommends that the verifier may use their professional judgement to determine how best to evaluate key personal and data management systems virtually.
5. **Implementation of designations for existing FCI pathways.** The proposed amendment to Section 95486.2(b)(1) allows for a designee to report for FCI pathways. SRECTrade requests clarification on Implementing this update, for example can existing FCI pathways and registrations be moved to a single consolidated account managed by the designee?

Sincerely,



Becca Teigen
Director, Clean Transportation
SRECTrade, Inc.
(415) 915-9053
Becca.teigen@srectrade.com

About SRECTrade

SRECTrade provides management and transaction solutions for renewable energy and clean fuel programs across North America. SRECTrade's parent company, Xpansiv, provides market infrastructure to rapidly scale the world's energy transition. Xpansiv operates CBL, the largest spot exchange for environmental commodities, including carbon credits and renewable energy certificates.