



October 25, 2024

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

RE: SUPPORT of Proposed Changes to California's Low Carbon Fuel Standard (LCFS)

Dear Chair Randolph and Board Members,

We are writing to you today as a broad coalition of executive leaders in the medium- and heavy-duty zero-emission transportation sector in support of a **yes vote** approving the proposed extension and expansion of the LCFS program at the upcoming November 8th Board meeting.

The undersigned companies: Forum Mobility, EV Realty, Gage Zero, Terawatt Infrastructure, Prologis Mobility, Voltera Power, and Zeem Solutions are providers of electric vehicle charging infrastructure for medium- and heavy-duty trucks, including shared depots that serve multiple fleets at a single location.

The LCFS program supports transportation electrification by facilitating infrastructure deployment, lowering fueling costs, and incentivizing the purchase of zero-emission vehicles. The proposed amendments being voted on at the November 8th Board Meeting significantly enhance these efforts. Notably, the proposed heavy-duty fast charging infrastructure (HD-FCI) program has the potential to be one of the most important programs in helping to deploy the charging infrastructure necessary for California to meet its zero emission transportation goals set by Governor Newsom's Executive Order N-79-20, along with recent regulations like the Advanced Clean Trucks (ACT) and Advanced Clean Fleets (ACF) rules. The HD-FCI provision addresses utilization risks in the early market phases, helping solve the "chicken or egg" dilemma that currently hinders infrastructure deployment. We appreciate the Board and staff's willingness to incorporate our extensive feedback during this process.

The proposed amendments expand the program past 2030 to 2045, increase carbon intensity reductions to 90%, and take several measures to reduce the accumulated bank of credits and increase credit values. This programmatic expansion will provide essential economic support to help fleets make the investments to operate ZEVs.

While we acknowledge that there are legitimate concerns on a variety of issues, including crop-based biofuels, the LCFS program remains an essential tool for advancing California's transportation electrification goals and regulations – particularly given current budget shortfalls and electricity rate affordability concerns. There is no other program in California's panoply of climate efforts that can replace the level and length of funding for transportation electrification that this proposal provides, and failure to extend the program would have a devastating impact on California's zero-emission freight



efforts. We strongly encourage the Board to adopt the proposed LCFS modifications and move forward with this important regulation, while concurrently committing to continuous future improvement.

Sincerely,

Zeina El-Azzi
Founder & CEO
Gage Zero LLC

Matt LeDucq
Founder & CEO
Forum Mobility

Paul Gioupis
Founder & CEO
Zeem Solutions

Neha Palmer
Co-Founder & CEO
TeraWatt Infrastructure

Brett Hauser
Chairman and CEO
Voltera Power

Patrick Sullivan
Founder & CEO
EV Realty

Henrik Holland
Global Head
Prologis Mobility

cc: Governor Gavin Newsom

Members, California State Senate

Members, California State Assembly

Steven S. Cliff, Ph.D., Executive Officer, California Air Resource Board