



CARB Hearing, November 8, 2024—Rivian Testimony As Intended

The following is a written version of Rivian's testimony as intended to be delivered via remote participation during public comment at today's hearing.

Thank you for the opportunity to speak today. My name is Chris Nevers, Senior Director of Public Policy at Rivian Automotive. Rivian is a manufacturer of all-electric vehicles including the R1T pickup, R1S SUV, and an electric delivery van. We also operate the Rivian Adventure Network with 18 fast-charging sites already open across California.

The LCFS is helping to unlock an EV future for Californians while tackling climate emissions across the transportation sector. Rivian supports several key aspects of the proposed amendments to this important regulation, including revised CI targets, the transformative extension of capacity credits for EV infrastructure, and new rules that would allow automakers to share in the generation of residential base credits.

Achieving California's bold EV goals will require every tool at the state's disposal, as well as collaboration across industries and stakeholders. CARB's proposal, including new rules on base credits, allows for just that, creating opportunities for both automakers and utilities to participate in growing the EV market in ways that reflect their unique competencies. With a share of base credits, OEMs would be empowered to efficiently and effectively make market-enhancing investments. Rivian is already considering several possibilities, including expansion of the Rivian Adventure Network. New opportunities would also exist to support take-home fleets who, under current rules, cannot capture credits from residential charging—a blind spot of the current policy. We look forward to working collaboratively with CARB to implement approved projects with transparency.

As a medium duty ZEV manufacturer, we appreciate the calls for establishing an MHD rebate program using LCFS credit revenue. But we are concerned that there are many unanswered questions about how such a program might be designed and implemented. Moreover, such a rebate program would likely not be up and running for quite some time. We believe the staff proposal to allow OEMs to earn a share of base credits is more fully developed at this stage and would allow for much more rapid and efficient reinvestment of credit proceeds. It's a smart idea to help our growing industry sustain its momentum.

Once again, Rivian thanks the Board and the staff for the care and thought put into this important rulemaking. A strong LCFS is crucial if the state is to achieve its goals. We respectfully encourage a vote to adopt the proposed amendments today and look forward to further engagement on implementation.