

April 16, 2025

Steven Cliff, Executive Director
California Air Resources Board

RE: SRECTrade Comments on Proposed Low Carbon Fuel Standard (LCFS) Amendments, Proposed Third 15-day Modifications (published April 4, 2025)

Dear Mr. Cliff:

SRECTrade appreciates the clarifications CARB made in the April 4, 2025 draft of the LCFS Amendments. We strongly support CARB's submission of the proposed modifications for adoption, as the amendments are critical to the long-term health of California's low carbon fuel economy.

However, SRECTrade submits the following comments specifically regarding the most recent updates to the EV charger accuracy verification process.

- **ACCURACY:** SRECTrade supports the inclusion of the 5% accuracy requirement added to Section 95191.2(a) for all metering as it strengthens the integrity of the credits generated and the program as a whole.
- **CALIBRATION REQUIREMENTS:** SRECTrade finds that the current edits to Section 95191.2(a)(1)(A) do not clarify how 'manufacturer's recommended procedures' for internal meters - *which do not have field calibration functionalities* - should be treated. Attempting to field calibrate an internal meter that is not designed for post-manufacturing adjustment can result in reduced accuracy, meter damage, voided warranties and compromised data security, which we do not believe is the intent of the regulation.

CARB's previous response to comments referenced that Section 95491.1(c)(1)(G) addresses internal meter accuracy requirements, however SRECTrade does not find Section 95491.1 clear as it relates to the issues above and the most recent revisions to Section 95191.2.

SRECTrade suggests the following options for resolving this issue while proceeding with the adoption of the Amendments:

- **CARB could add specific language that clearly indicates that manufacturers specifications certifying internal meters accuracy within 5% are acceptable documentation for verifiers to ensure compliance.** Similarly, documentation of an EV charger's certification of compliance with other California EVSE standards (such as the DMS CTEP) should also be considered acceptable evidence of accuracy for verification purposes.
- **Alternatively, CARB could remove the most recent edits and leave the language as previously proposed in Section 95191.2 and work with the EV charging industry to develop guidance on metering accuracy verification.** This guidance could provide more detail and specific direction than what is currently possible in the regulation.

Sincerely,



Ryan Huggins
SRECTrade, Inc.

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.