

April 21, 2025

Honorable Chair Liane Randolph and Honorable Board Members California Air Resources Board 1001 | Street
P.O. Box 2815
Sacramento, CA 95812

Re: Proposed Third 15-day Change Amendments to the Low Carbon Fuel Standard Regulation

Submitted to https://ww2.arb.ca.gov/applications/public-comments

Dear Chair Randolph and Honorable Board Members:

CalETC appreciates this opportunity to SUPPORT the Low Carbon Fuel Standard (LCFS) regulation. CalETC believes that the changes contained in the Third 15-day Change Amendments address the concerns raised by the Office of Administrative Law (OAL) as well as incorporating changes identified in CARB Board Resolution 24-14 upon adoption of the LCFS amendments on November 8, 2024.

CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Northern California Power Agency, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, developers and operators of charging stations and other industry leaders supporting transportation electrification. CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. Additionally, CalETC believes that LCFS provides benefits for consumers and is an important tool in the transition to a decarbonized economy.

As noted in our February 20 and August 27, 2024 comment letters, CalETC strongly supports the Low Carbon Fuel Standard as it has been tremendously successful in supporting the transition from petroleum to cleaner transportation fuels including electric fuel. CalETC appreciates the

opportunity to provide comments on this important regulation. If you have any questions, please do not hesitate to contact me at any time.

Best,

Laura Renger

Executive Director

cc: Rajinder Sahota

Matthew Botill

Jordan Ramalingam