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April 21, 2024

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically via: <https://ww2.arb.ca.gov/applications/public-comments>

Re: Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation

Dear Chair Randolph and Honorable Board Members:

This letter is submitted on behalf of Los Angeles Department of Water and Power, Pacific Gas and Electric Company, Sacramento Municipal Utility District, San Diego Gas & Electric Company, Southern California Edison Company, Burbank Water and Power, Pasadena Water and Power, and the Northern California Power Agency ("the CA Utilities"). The CA Utilities appreciate this opportunity to comment on the additional modifications to the Low Carbon Fuel Standard (LCFS) amendments for a third 15-day public comment period. The CA Utilities believe these changes 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.

The California Utilities are supportive of the most recent changes made to the California Clean Fuel Reward (CFR) program, including removing the participation exclusion for High Priority and Federal Fleets and rescinding the option for the Executive Officer to redirect base credits from the CFR to OEMs. Both these changes provide clarity and increase certainty, allowing the EDUs to more effectively plan for the program's success. The California Utilities understand the importance of a strong medium- and heavy-duty incentive program to galvanize the market, reduce local air pollution, and support the state's climate goals.

The California Utilities appreciate the extensive opportunities for comment throughout the rulemaking process and urge a swift adoption of the regulation.

Respectfully,

The CA Utilities

cc: Rajinder Sahota
Matthew Botill
Jordan Ramalingam