



Comments of Kia Corporation
to the
California Air Resources Board

**RE: 15-Day Notice of Modifications to
Proposed Low Carbon Fuel Standard Amendments**

April 21, 2024

The Kia Corporation (Kia) submits these comments to the California Air Resources Board (CARB) on the modifications to amendments to the Low Carbon Fuel Standard (LCFS) published on April 4, 2025 (third proposed 15-day changes to the LCFS).

Kia, part of the Hyundai Motor Group (HMG), is a dynamic part of the world's third largest automaker. Kia is committed to electric vehicles (EVs) and is investing \$28 billion by 2027 into EVs and other advanced technologies. Kia is focused on popularizing EVs at all levels of the market and becoming a global leader in EVs and electrification.

Kia supports comments submitted by the Alliance for Automotive Innovation (AAI) that recommend modifying subsection (c)(1)(B) of subsection 95483 to direct the Executive Officer to allot 45% of base credits for residential electric vehicle charging to automakers (OEMs). The latest 15-day notice has removed any opportunity for revenue generated by light duty (LD) EVs to be used to promote the LD EV market. Kia opposes this change. Kia continues to strongly support CARB providing base credits to OEMs of LD EVs. Providing base credits to LD EV OEMs is a direct and effective way to advance electrification, and thereby reduce emissions of GHGs, in the transportation sector.

According to the California Greenhouse Gas Emission Inventory Program, passenger vehicles are the single largest source of greenhouse gas (GHG) emissions (27.6%) in the state, emitting more GHGs than the electricity (16.1%) and agricultural (8%) sectors combined.¹ Directly addressing emissions from this sector may have the largest impact in reducing GHG emissions.

Kia routinely and extensively provides customer rebates on EVs. Kia also invests in advancing EV charging infrastructure through investments in IONNA and works with partners such as Wallbox and Electrify America. New proceeds from base credits will position Kia and other OEMs to increase their ability to provide customer rebates on EVs, reducing consumer-facing transaction prices, and increase investments in advancing EV infrastructure. Reduced EV transaction prices and accelerated EV infrastructure growth will serve to increase EV adoption and thereby the use of low-carbon intensity (low-CI) electricity as a transportation fuel. This is a double benefit to consumers as low-CI electricity is generally more affordable than gasoline and other liquid transportation fuels.

¹ California Air Resources Board, "Current California GHG Emission Inventory Data", accessed April 2025

Kia appreciates the opportunity to provide comments on the proposed modifications and looks forward to continuing working with CARB to advance the state's goals.