

April 21, 2025

The Honorable Liane M. Randolph, Chair
California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: 3Degrees Comments in Response to Third Notice of Public Availability of Modified Text and Availability of Additional Documents and Information

Dear Chair Randolph and California Air Resources Board (CARB) Staff,

Thank you for the opportunity to provide comments in response to the Modified Text of the Low Carbon Fuel Standard (LCFS) Regulation published April 4, 2025. 3Degrees Group Inc. (“3Degrees”) is a global climate and clean energy solutions provider and is a strong supporter of the LCFS program. We participate in the program as a designated reporting entity on behalf of a variety of opt-in parties with light-duty electric vehicle (EV) chargers, electric forklifts, hydrogen forklifts, and heavy-duty EV fleets. We are also an active fuel pathway developer.

3Degrees appreciates the time and effort that Staff has put into engaging the public and crafting these updates to the program over the last few years and for considering our comments that were submitted in response to the 45-Day and 15-Day draft rule packages published last year. We recognize that CARB must address OAL’s concerns regarding the Proposed Amendments and we support the changes CARB has made.

We urge CARB to prioritize the prompt finalization and resubmission of the Modified Text with the earliest possible effective date.

The extended rulemaking process has created uncertainty and deterioration in the credit market. Regulatory stability enhances market efficiency by minimizing price volatility and allowing market participants to allocate resources optimally. A swift resubmission to OAL will signal CARB's commitment to the LCFS program and its goals, which will support more efficient and stable market operation. Additional delay could cause further market disruption and undermine the program's effectiveness by eroding confidence and impeding future market development.

3Degrees appreciates this opportunity to provide feedback and we look forward to continuing to work with CARB on the success of the LCFS program. Please reach out with any questions or for further discussion.

Sincerely,

/s/ Lexi Concannon

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