



April 21, 2025

Rajinder Sahota
California Air Resources Board (CARB)
1001 I Street
Sacramento, California 95814

RE: Electrify America comments on the Third 15-Day Changes to the Low Carbon Fuel Standard (LCFS) Amendments

Dear Ms. Sahota:

Electrify America appreciates the opportunity to comment on this third set of 15-day changes to the Low Carbon Fuel Standard (LCFS) regulation, and we thank CARB staff for moving quickly to refine and finalize this critical rule.

Electrify America operates the largest open network of hyper-fast EV chargers in the United States—offering speeds up to 350 kW—including more than 1,200 chargers across 265+ publicly accessible locations in California. Programs like the LCFS make this kind of infrastructure buildout possible by supporting investment in EV charging and accelerating growth in the broader electric vehicle market. It is critical that these updated program amendments are implemented promptly to send a strong and stabilizing market signal.

Importance of a Timely Implementation

Electrify America supports CARB's overall direction in the proposed changes, which reflect targeted updates responsive to stakeholder input and aligned with concerns raised by the Office of Administrative Law. We continue to strongly support both the 9% carbon intensity (CI) stringency step-down and the creation of the auto acceleration mechanism (AAM), which together are essential to restoring LCFS market stability and sustaining investment in EV infrastructure and other clean fuels.

Timely implementation of these amendments is critical to ensure market confidence and certainty. We are concerned that continued delays in finalizing the regulation could prevent the step-down from applying in Q1 2025, limiting meaningful structural corrections to support credit market stability before the AAM can first take effect in 2028. The step-down is essential to providing interim market direction and ensuring the LCFS continues to drive clean transportation investment. We encourage CARB to finalize these regulations and to work closely with the Office of Administrative Law to ensure the package is finalized as quickly as possible.



Implementation Considerations and Continued Partnership

We also want to note for staff that the proposed definition of “quality assured data” may lead CARB to require accuracy demonstrations for equipment that is explicitly exempt from metrology requirements under the California Department of Food and Agriculture Division of Measurement Standards (DMS) regulations (CCR Section 4002.11¹). We look forward to working with CARB to ensure implementation remains aligned with DMS requirements and avoids unnecessary market disruption.

Electrify America appreciates CARB staff’s thorough public engagement throughout this rulemaking process. We remain committed to partnering with the agency to advance California’s clean transportation goals and look forward to continued collaboration as these provisions are implemented.

Sincerely,

/s/

Rhiannon Davis
Director of Government Affairs
Electrify America, LLC

¹ <https://www.law.cornell.edu/regulations/california/4-CCR-4002.11>