

April 21, 2025

Chair Liane Randolph and Board Members
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: SUPPORT of Proposed Changes to California's Low Carbon Fuel Standard (LCFS): Third 15-Day Changes

Dear Chair Randolph and Board Members,

We are writing to you today as a broad coalition of companies in the medium- and heavy- duty zero-emission transportation sector in support of the Low Carbon Fuel Standard (LCFS) program. We believe that the Third 15-day Changes address the concerns raised by the Office of Administrative Law (OAL). These amendments also appropriately incorporate direction from California Air Resources Board Resolution 24-14 following the November 8, 2024 meeting and vote on adoption of the LCFS program amendments.

The undersigned companies: EV Realty, Forum Mobility, Greenlane, Highland Electric, Prologis Mobility, Terawatt Infrastructure, Voltera Power, WattEV, and Zeem Solutions are providers of electric vehicle charging infrastructure for medium- and heavy-duty trucks, including shared depots that serve multiple fleets at a single location. As noted in our prior comments, we believe the LCFS program supports transportation electrification by facilitating infrastructure deployment, lowering fueling costs, and incentivizing the purchase of zero-emission vehicles.

The amendments adopted in November of 2024 and further clarified in this latest 15-Day Notice strengthen an already powerful program. The HD-FCI provision addresses utilization risks in the early market phases, helping solve the "chicken or egg" dilemma that currently hinders infrastructure deployment, and the 15-Day Changes appropriately clear up lingering uncertainty highlighted by OAL around geographic restrictions for this provision. Additionally, we support the clarification that "base credits" issued to electric distribution utilities are to be allocated to a statewide Clean Fuel Reward program for medium- and heavy-duty vehicles. This clarification addresses OAL questions and accurately reflects direction from Board Members as detailed in Resolution 24-14.

We appreciate the opportunity to provide comments on this vitally important program. We are at a pivotal moment for a variety of climate and clean air goals that depend in part on a strong and well-designed LCFS program. Timely adoption and implementation are needed to provide clear market signals for the nascent fleet electrification industry.

Yours,

Jamie Hall
Director, Policy
EV Realty

Andrea Pratt
VP, Government and Utility Relations
Greenlane Infrastructure

Alexis Moch
VP, Government Affairs
Prologis

Tom Ashley
VP, Government and Utility Relations
Voltera Power LLC (Voltera)

Margaret Boelter
Policy & Government Relations
Zeem Solutions

Adam Browning
EVP Policy and Communications
Forum Mobility

Jane Israel
Sr. Western Regional Manager, Market
Development
Highland Electric Fleets

Sam Vercellotti
Director, Policy
Terawatt Infrastructure

Salim Youssefzadeh
Chief Executive Officer
WattEV