



August 8, 2022

Cheryl Laskowski, Ph.D.
Branch Chief, Low Carbon Fuel Standard Team
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Potential Changes to the Low Carbon Fuel Standard

Dr. Laskowski:

WattEV appreciates this opportunity to provide comments to the California Air Resources Board on the topic of potential changes to the Low Carbon Fuel Standard. WattEV is a Long Beach-headquartered technology group that is revolutionizing the transportation industry through the development of affordable, and conveniently accessible charging infrastructure to support fleets of medium- and heavy- duty electric vehicles (MHDEV). To aid in the transition to MHDEVs and the utilization of public charging stations, WattEV plans to own and operate its own fleet of up to 12,000 MHDEVs as part of its "Truck-as-a-Service" (TaaS) program. This lease alternative business platform aims to eliminate the economic burden and risk associated with transitioning to MHDEVs, especially for those smaller fleets and independent contractors with limited capital. Below you will find our comments regarding LCFS Program changes proposed at the workshop.

Strengthening the Reduction Targets

Due, in part, to the LCFS program, decarbonization is accelerating, and the program is on track to meet the current reduction target early. In response, CARB is proposing two scenarios that would move the current target from 20% by 2030 to 25% or even 30%. This would increase demand for credits in the near to mid-term and create a much stronger price signal. WattEV supports the scenario in which CARB strengthens the requirement to 30%; positioning California to meet its long-term climate goals.

Fast Charging Infrastructure (FCI) Credits for Medium and Heavy-Duty Vehicles

As discussed in the public workshop on July 7, CARB considers expanding capacity credits to Medium- and Heavy- Duty infrastructure to support the buildout and operation of ZEV charging infrastructure as vehicle deployment increases. FCI provides a "minimum" credit generation based on capacity of infrastructure, not the amount of fueling. The program is limited only to light-duty, but CARB seems interested in expanding to medium and heavy duty; understanding that charging and refueling infrastructure supports the growth of ZEV MHD trucks on the road.

In response to the MHD FCI design consideration, WattEV concurs that eligibility should be limited to locations in California, primarily serve MHD vehicles, and be strictly limited to locations that are designated as publicly accessible. The public aspect is important because it supports smaller owner operators while sending a signal that these vehicles can be used in operations outside of a return to base model. It is also acceptable that the crediting period should be 5 years and that the total credits be 2.5% of previous quarter deficits.

Thank you, again, for the opportunity to provide comment Low Carbon Fuel Standard program.

Sincerely,

A handwritten signature in black ink, appearing to read "Sahim Youssefzadeh".

Sahim Youssefzadeh, CEO