



Coulomb
Technologies



July 22, 2011

Mary D. Nichols, Chairman
California Air Resources Board (CARB)
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: EV Service and Equipment Provider (EVSEP) Coalition Position – Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation

Dear Chairman Nichols,

The EV Service and Equipment Provider Coalition thanks the California Air Resources Board and staff for their work in preparing the proposed amendments to the low carbon fuel standard (LCFS) which will be reviewed at a public hearing on July 22, 2011. We are pleased to provide you with our position and look forward to working with you and agency staff to develop a final standard that takes into account the role of EVSEPs in enabling electricity as a transportation fuel. Consistent with other alternative fuels (i.e. compressed natural gas) where fuel providers earn credits, the EVSEP Coalition strongly supports similar provisions for third parties in the LCFS.

Better Place, Coulomb Technologies, and ECotality are all California based companies that as EVSEPs will enable the charging of electric vehicles in residential, commercial and public settings to achieve the LCFS standard. According to the purpose and definitions in the LCFS, third parties should qualify to claim credits for electricity used as a transportation fuel dispensed through the electric vehicle charging infrastructure that they install, own and operate in residential, public and commercial locations. However, the current proposed language fails to explicitly acknowledge the ability of third parties to claim LCFS credits in residential and commercial locations, noting only public charging. Omitting the role of EVSEPs in the home and in workplace charging is not only out of sync with the dynamics of the EV market in California, but would also be inconsistent with the California Public Utilities Commission (CPUC) recent decision (D.10-07-044) to reflect EVSEPs' right to operate as a provider of electric vehicle charging equipment to residential as well as public and commercial customers.¹

¹ California Public Utilities Commission D. 10-07-044, pg. 18, August 2, 2010

As third parties, we supply technology to the marketplace that both meters and controls the flow of electricity to vehicle charging equipment. As clean technology leaders, our companies are developing innovative solutions to make switching to electric vehicles easy for consumers. We are investing significant private funding to develop and deploy smart charging technology which enables the delivery of electricity as a transportation fuel and provides energy and load management solutions for customers. Compliant with the LCFS, EVSEPs will execute contracts with residential, commercial and public customers or hosts to provide electric vehicle services, including charging equipment, charge management and other value-added services, thus providing consumers with a complete suite of products to enable the transition to electric vehicles.

We respectfully request staff to modify the proposed amendments addressing electricity as a transportation fuel and add the following provisions to the LCFS:

- Non-utility third parties are eligible to receive credits for residential, commercial and public access EV charging equipment that they install, maintain and operate that delivers service to the customer.
- Credits will be received by the entity that installs and operates a contract to maintain or otherwise service the charging equipment. The third party provider can elect to pass on the credits to the customer.
- Harmonize the LCFS standard to be consistent with the CPUC policy on enabling a competitive, open access market for EV services in California to encourage EV investment and innovation.

EVSEPs are bringing innovative hardware and software tools to the EV charging marketplace. It is important that CARB reconciles its LCFS position with public policy recognizing EVSEPs' role in EV charging and recognize the contribution that EVSEP technology and services will serve in enabling electricity as a transportation fuel to California drivers.

Thank you for the opportunity to provide comments. Please feel free to contact us if you and your team have additional questions or concerns.

Sincerely,

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