From: Eileen Tutt [mailto:Eileen@caletc.com]
Sent: Wednesday, January 17, 2018 11:48 AM
To: Wade, Samuel@ARB; Yuan, Jing@ARB; Singh, Manisha@ARB
Subject: RE: LCFS Workshop comments

Dear Sam, Manisha and Jing
CalETC would like to augment, via this email, out comments attached to the email below. In addition to the comments in the letter, CalETC submits:

Non-residential LCFS Credit Generators.

Staff is proposing that any entity with metering capability would be enabled to generate LCFS credits for electricity used in non-residential transportation electrification applications (specifically public-access charging, private-access charging such as fleet or workplace).

CalETC supports this concept in general with the following modifications and recognitions:

a. The site host should be the first-in-line credit generator. The site host, and in some cases the EDU, is making the investment in charging equipment. CalETC believes the best incentive for site hosts to invest in infrastructure is to designate the site host as the first-in-line generator of LCFS credits, with full authority to assign LCFS credit generation to another party.
b. However, if the site host is not designated as the first-in-line credit generator, then additional requirements should be placed on the credit generator that could include the following: 1) explain at a high-level the LCFS program and why CARB has created it and 2) the site host agrees, through a written letter or contract, to allow the 3rd party to generate the credits.
c. Investment in transportation electrification. CalETC believes LCFS credit generators should be subject to the same requirements, for all parties generating non-residential LCFS credits. And that the value associated with the LCFS credits should be used to support transportation electrification. In the case of the site host, the value should be invested in transportation electrification.
EDUs have all begun programs to use the LCFS residential credit value to support transportation electrification. Some public utilities have already begun generating non-residential credits and investing LCFS credit value to support transportation electrification in the non-residential market segment (e.g., fleets, workplaces and multi-family installations). Investor-owned utilities have all begun implementing their programs for residential LCFS credits, which can be scaled to support non-residential transportation electrification. The CPUC has approved investor-owned utility programs for light duty EVs including non-residential charging programs and is poised to approve SB 350 utility programs, which will result in IOUs investing significantly more in non-residential charging. If other entities generate LCFS credits for non-residential applications, CalETC believes it is imperative that the value be used to support transportation electrification.

Thank you for your consideration.
Regards
Eileen

Eileen Wenger Tutt
Executive Director
California Electric
Transportation Coalition 1015
K Street, Suite 200
Sacramento, California 95814
(916) 551-1943 (o)
(916) 952-7026 (c)
eileen@caletc.com

From: Eileen Tutt
Sent: Friday, December 22, 2017 9:25 AM
To: Wade, Samuel@ARB <Samuel.Wade@arb.ca.gov>; 'Yuan, Jing@ARB' <jyuan@arb.ca.gov>; Singh, Manisha@ARB <Manisha.Singh@arb.ca.gov>
Subject: LCFS Workshop comments

Dear Sam, Manisha and Jing
Please see the attached additional comments on the upcoming LCFS rulemaking, augmenting previous comments submitted by CalETC.

Thank you for the work that you do and I hope you all have a wonderful holiday and Happy New Year!

Regards
Eileen

Eileen Wenger Tutt
Executive Director
California Electric Transportation Coalition
1015 K Street, Suite 200
Sacramento, California 95814
(916) 551-1943 (o)
(916) 952-7026 (c)
eileen@caletc.com