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California Air Resources Board
1000 I Street
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December 4, 2017

**RE: CHARGEPOINT COMMENTS ON THE LOW CARBON FUEL STANDARD 2018
AMENDMENTS—PRE-RULEMAKING**

I. INTRODUCTION

ChargePoint respectfully submits these comments in regards to Pre-Rulemaking 2018 amendments to the California Air Resources Board (CARB) Low Carbon Fuel Standard (LCFS) Program.

ChargePoint is the largest electric vehicle (EV) charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 43,000 independently owned charging spots, including more than 23,000 ports across the State of California, and more than 7,000 customers (including workplaces, cities, retailers, apartments, hospitals and fleets), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every category. Leading EV hardware makers, automakers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 30 million charging sessions, saving upwards of 29 million gallons of gasoline and driving more than 716 million gas-free miles.

II. DISCUSSION

The following are ChargePoint's comments on 2018 amendments for the LCFS Program:

- ChargePoint supports [Tesla's recommendation](#) specifically relating to retiring Renewable Energy Credits (RECs) to match the associated energy used for metered electric vehicle charging. Creating this new Carbon Intensity (CI) pathway would promote more renewable deployment, thus continuing to lower the CI of electric vehicle charging. RECs should be created in the year that the LCFS credits are generated, but we do not support that the credit generating facility (e.g. solar plant) needs to be put online the same year that the LCFS credits are generated.
- ChargePoint recommends a workplace pilot to test the [Time-of-Use proposal from the Staff Presentation at the workshop on Nov. 6 \(Slide 71\)](#). Since the Time-of-Use (TOU) concept incentivizes middle of day charging it most closely matches the usage associated with workplace charging, where there is certainty and predictability around charging patterns, which makes it a strong initial segment to test the concept. That said, other segments, including non-workplace commercial, would be incentivized in a way that's conflicting to the normal usage pattern, which would create confusion for site hosts, who set pricing policies (to encourage or discourage charging behavior), as well as EV drivers. For example, municipal parking lots in downtown areas mostly see greater usage after 5pm, but if LCFS crediting promotes site hosts to set punitive pricing during that time, to encourage charging when they will receive more credits, it can create a problematic situation for both the site hosts and drivers. Additionally, a workplace pilot



would provide a trial period to determine the best way to aggregate and share data. The data collection process should not be burdensome and competitive data, such as load profiles by site, should be protected by a confidentiality agreement. Piloting the TOU concept for workplaces will give CARB the ability to explore and refine implementing best practices with select market participants before scaling to the whole market.

- Regarding TOU for metered residential stations, we recommend making sure that there is alignment between the LCFS TOU evening charging increased crediting as well as the IOU EV tariffs. Mixed signals about when to charge would not be beneficial for market adoption. Additionally, within the residential context, we support the [Smart EV Charging Group's written comments submitted on Oct. 6](#) that addresses "GHG Minimization with Intentional, Dynamic EV Charging Scheduling". CARB has suggested that this method is administratively burdensome, but it seems that it would be very similar to the level of detail and effort required in the TOU method. Both methodologies require looking at individual charging sessions from individual EV chargers to assign appropriate crediting.
- ChargePoint supports the inclusion of a CCA LSE CI pathway in the LCFS Regulation. Specifically, we support the [comments submitted by the Smart EV Charging Group on Oct. 6](#) that addresses "EV Charging from Verified Lower Carbon Intensity Electricity Supply Sources".

III. CONCLUSION

ChargePoint appreciates the opportunity to submit these comments and looks forward to continuing to work with the Air Resources Board, as well as other stakeholders, on continuing carbon emission reductions associated with alternative fuels through the Low Carbon Fuel



Standard Program.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "A. Harrison", with a long horizontal flourish extending to the right.

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