



ChargePoint, Inc.

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November 18, 2019

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Proposed Modifications to the Low Carbon Fuel Standard Regulation**

ChargePoint offers the following comments regarding the Air Resources Board's (ARB) proposed modifications to the Low Carbon Fuel Standard (LCFS). We greatly appreciate staff's efforts to develop these regulations and the opportunity to provide comments.

ChargePoint is the world's largest electric vehicle (EV) charging network with more than 104,000 Level 2 EV and direct current fast charging spots. ChargePoint's customers include major employers, municipalities, universities, utilities, real estate developers and parking garage facility owners and operators that provide EV charging and related services to EV drivers.

Our comments specifically address the investments of holdback proceeds to support transportation electrification. We are strongly supportive of prioritizing investments in disadvantaged and/or low-income communities as these communities are often disproportionately affected by the impacts of climate change and we are pleased to see the revenue from this program being used to continue to promote transportation electrification in disadvantaged communities.

ChargePoint urges that the requirements for these investments contain checks and balances that align with the requirements of investments already being made under SB 350 and that will be continued to be made under the DRIVE OIR<sup>1</sup>. To this end, language should be added to ensure that utility investments using LCFS proceeds support customer choice and competition. As stated in SB 350, "Widespread transportation electrification should stimulate innovation and competition, enable consumer options in charging equipment and services, attract private capital investments, and create high-quality jobs for Californians, where technologically feasible."<sup>2</sup> Therefore, we urge the board to adopt the regulations with the following modifications:

*Restrictions on Use of Holdback Credits. Documentation of adherence to the following restrictions must be included in § 95483. Fuel Reporting Entities. 14 the annual report submitted pursuant to section 95491(d)(3)(A)5.*

*a. Effective January 1, 2022, at least 30 percent in year one, 40 percent in year two, and 50 percent in subsequent years of holdback credit proceeds must be used to support transportation electrification ... These projects may include:*

*i. Electrification and battery swap programs for school or transit buses.*

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<sup>1</sup> California Public Utilities Commission Rulemaking 18-12-006

<sup>2</sup> Public Utilities Code §740.12(a)(1)(C)



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- ii. Additional rebates for low-income individuals, beyond the Clean Fuel Reward and other existing federal and State rebates, for the purchase of new or previously owned EVs, or for the electricity to charge EVs.*
- iii. Electrification of drayage trucks.*
- iv. Investment in EV charging infrastructure, including charging infrastructure in multi-family residences, **that stimulate innovation and competition, enable consumer options in charging equipment and services.***
- v. Investment in electric mobility solutions, such as EV sharing, ride hailing, and transit pass programs.*
- vi. Multilingual marketing, education, and outreach on the benefits of EV transportation; basic maintenance and charging of EVs; electric rates designed to encourage EVs; and local, state, and federal incentives available for purchase of EVs.*
- vii. Rebates, credits, or other incentives for nonresidential charging for low-income individuals. Alternatively, EDUs, in coordination with local environmental justice advocates and local municipalities, may develop and implement other projects that promote transportation electrification in disadvantaged and/or low-income communities or for low-income individuals.*

*These alternative projects are subject to approval by the Executive Officer. Applications submitted to the Executive Officer must include, and will be evaluated for approval based on, a complete description of the project, demonstration that the project promotes transportation electrification in disadvantaged and/or low-income communities or provides increased access to electric transportation for low-income individuals, **stimulate innovation and competition, enable consumer choice**, and evidence that the project was developed in coordination with local environmental justice advocates and local municipalities.*

The California Public Utilities Commissions should review all utility investments to ensure they are made in compliance with the requirements set out these proposed modifications, as well as other electric vehicle infrastructure investment programs.

We greatly appreciate the opportunity to provide these comments. If you have any questions or seek further clarification, please contact Alex Leumer, [alexandra.leumer@chargepoint.com](mailto:alexandra.leumer@chargepoint.com).

Sincerely,

A handwritten signature in black ink that reads "Alexandra Leumer".

Alexandra Leumer  
Director of Public Policy  
ChargePoint