



June 19, 2015

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: SUPPORT for Re-Adoption of the Low-Carbon Fuels Standard as modified by the proposed 15-day Regulation Order

Dear Chairman Nichols and Honorable Board Members:

The California Electric Transportation Coalition (CalEtc) appreciates the opportunity to comment in support of re-adoption of the Low Carbon Fuels Standard (LCFS) as modified by the proposed 15-day Regulation Order. CalEtc is a non-profit association with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric and Southern California Edison. Our membership also includes major auto makers and we work closely with our colleagues in the alternative fuels community.

First, we laud the California Air Resources Board (CARB) in the design and implementation of the LCFS. The regulation sets a standard for the regulated industry and allows the industry to determine how best to meet that standard, providing flexibility in an industry long constrained by the transportation sector's near-total dependence on only one fuel. The LCFS program has resulted in unanticipated innovation in both fuels and vehicles and expanded consumer choice. In the first years of implementation of the LCFS, industry is over-complying, credits are being generated from unanticipated and innovative sources, and consumers are responding to expanding choices in fuels and vehicles.

CalEtc particularly appreciates CARB's recognition that electricity is a fundamentally different fuel option for consumers. The CARB approach to electricity supports consumer choice in fuels and fueling options and does not tie electricity to a liquid fuel paradigm that could restrict consumer options. The unanticipated innovations the LCFS has helped bring to market, including the proliferation of many vehicle and fueling options for electricity, present unique challenges for CARB. CARB staff has demonstrated an exceptional ability to develop and implement a regulation that allows consumer-driven free-market approaches to reducing the carbon content of our transportation fuels sector.

We respectfully submit the following comments on the proposed 15-day Regulation Order:

- CalEtc appreciates the opportunities for utilities to earn LCFS credits for workplace, fleet and public-access locations, in those instances where the site host does not want to take on that role.

**Honorable Chairman Mary D. Nichols and Honorable Board Members
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- CalETC supports the increased transparency and specificity included for the residential charging LCFS credit estimation formula. CalETC will continue to support CARB and provide as much information as we have to ensure transparency and robustness.
- We also support the other clarification modifications that were included in the electricity section.
- CalETC supports the CARB staff recommended carbon intensity for electricity.

In closing, CalETC supports re-adoption of this groundbreaking and essential regulation. Thank you for your consideration and ongoing leadership.

Regards



Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition

EWT/kmg