



March 25, 2019

Sent via email to comment docket

Re: CARB proposal for Low Carbon Fuel Standard annual updates to lookup table pathways for average grid electricity and smart charging

Dear Mr. Prabhu.

CalETC appreciates this opportunity to provide comments on the annual lookup table updates for electricity allowed under the Low Carbon Fuel Standard (LCFS) regulation. We also appreciate the tremendous effort and accessibility of CARB staff during the extensive public process leading up to this point.

CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail.

CalETC supports the LCFS, a program that has been successful thus far in reducing the carbon intensity of California's transportation fuel. Given the near-total dependence on oil in the transportation fuels sector, the LCFS is essential to both diversify the transportation fuels sector and reduce emissions from carbon-based fuels.

CalETC has reviewed the document posted on Feb 8 and accompanying data sources cited in the footnotes (e.g., the California Energy Commission and California Public Utilities Commission). CalETC complements staff on a detailed and thorough analysis and supports staff's proposals in Table 1: Proposed CI Values for 2019 Annual Update to Electricity Lookup Table Pathways and Table 2: Proposed CI Values (gCO<sub>2</sub>e/MJ) for Smart Charging or Smart Electrolysis in 2019.

Thank you for the opportunity to comment.

Regards,

A handwritten signature in blue ink, appearing to read "Eileen Wenger Tutt".

Eileen Wenger Tutt, Executive Director  
California Electric Transportation Coalition