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August 30, 2018

SENT VIA ELETRONIC SUMBISSION

Mr. Sam Wade
Chief, Transportation Fuels Branch
California Air Resources Board, Industrial Strategies Division
P.O. Box 2815
Sacramento, CA 95812

RE: August 13, 2018 Public Availability of Modified Text and Availability of Additional Documents and Information for Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels

Dear Mr. Wade,

Thank you very much for the opportunity to submit comments on the on the most recent 15-day Notice made available on August 13, 2018. SRECTrade appreciates staff's August 8, 2018 presentation.

In the presentation, slide 33 speaks to Staff's proposal to keep opt-in EDUs as the eligible credit generator for electric vehicle charging at multi-family residential properties. This proposal differs from what was presented at the June 11, 2018 workshop. In that meeting, Staff noted that the owner of FSE, or a designee, would be able to generate LCFS credits.

SRECTrade would requests that Staff consider allowing the owner of the FSE at multi-family properties to opt-in for LCFS credit ownership. EDUs would receive credits not claimed as originally suggested by Staff. We believe that the owner of the EV Charging Stations at a multi-family property would be no different than the entity owning EV Charging Stations or FSE at a non-residential property (i.e. a private workplace locations or commercial shopping centers). In many instances, the underlying owners of these properties responsible for initiating the investment in the FSE or EV Charging Stations could be the same entity. For example, many Real Estate Investment Trusts or other property owners maintain investments in both Multi-Family and Commercial or Industrial properties. It appears that allowing these property owners to be able to gain access to the same underlying incentive to make investments in EV Charging Stations and/or FSE should be available to them regardless of the type of property they own.

Thank you very much for your time and consideration as you review these comments. We welcome the opportunity for further clarification and discussion of our comments.

Best Regards,

A handwritten signature in black ink that reads "Steven Eisenberg".

Steven Eisenberg, CEO
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