

November 5, 2020

California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: Low Carbon Fuel Standard (LCFS) Potential Regulation Amendments

EVgo appreciates the opportunity to provide feedback on the California Air Resources Board's (CARB) proposed amendments to the LCFS. Headquartered in California, EVgo owns and operates the largest network of public fast charging stations in the country, with over 800 station locations across the United States. In California, where more than half of the EVs in the U.S. are currently located, EVgo's network includes more than 300 fast charging locations and 750 fast chargers across the state, connecting more than 80% of Californians to an EVgo fast charger within a 15-minute drive. Additionally, thanks in part to the Renewable Fuels Pathways within the LCFS program, in 2019 EVgo became the first North American charging market to be powered by 100% renewable energy.

EVgo thanks CARB for its work on the LCFS, which has been a transformative policy tool for accelerating transportation electrification in this still nascent industry. As a leading EV charging company headquartered in California, and with more than half of its charger count in California, EVgo appreciates the opportunity to leverage LCFS as an important tool to continue to support transportation electrification and EV adoption across the state.

EVgo supports several of the proposed amendments shared by CARB staff in the October workshops. Notably, we are encouraged to see CARB exploring a rulemaking for post-2030 LCFS to align with the Governor's Executive Order.¹ As California looks to move to 100% zero emissions vehicle (ZEV) sales by 2035, California will need to greatly scale its current efforts in supporting the deployment of the infrastructure necessary to achieve ubiquitous ZEV adoption. LCFS will continue to be an important tool over the long term and should be future-proofed as technology continues to evolve, especially in the fast charging space. Similarly, an extension of the Fast Charging Incentive (FCI) program may be warranted upon an updated analysis of infrastructure gaps to meet new goals for 2035.

EVgo appreciates CARB's suggestions to streamline reporting and strongly supports the proposal to remove geocoordinates when submitting FCI applications. EVgo also encourages the charger level geocoordinates requirement to be removed for LCFS, as the extreme precision required is challenging to achieve, yields little benefit, and will likely require companies to purchase surveying tools. If geocoordinates *must* be included, EVgo recommends they be at the station level rather than the charger level.

EVgo seeks further clarity on the Electricity Credit Proceeds Spend Requirements. Notably, on p. 25 of the slide deck from October 14², CARB notes that they intend to explore amendments to the electricity credit proceeds spend requirements and "[a]dd details on appropriate uses of credit proceeds, including limits on using for administrative costs." EVgo seeks clarity as to what CARB defines as an

¹ <https://www.gov.ca.gov/2020/09/23/governor-newsom-announces-california-will-phase-out-gasoline-powered-cars-drastically-reduce-demand-for-fossil-fuel-in-californias-fight-against-climate-change/>

² See slide #25 https://ww2.arb.ca.gov/sites/default/files/2020-10/101420presentation_carb.pdf

“administrative cost,” as well as further clarity as to how CARB will work with applicants to better understand how to operationalize any additional reporting changes.

Conclusion

EVgo thanks CARB for the opportunity to provide input on these proposed amendments. LCFS is a valuable tool to promote EV infrastructure deployment now and going forward, and we look forward to continued collaboration with CARB to maintain momentum in accelerating transportation electrification. Please do not hesitate to be in contact if we can answer any questions or be a resource.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sara Rafalson', enclosed in a thin black rectangular border.

Sara Rafalson, EVgo
Senior Director, Market Development
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