



August 19, 2009

Clerk of the Board  
Air Resources Board  
1001 "I" Street, 23rd Floor  
Sacramento, California 95814

Re: Comments of the California Electric Transportation Coalition on the Modified Regulation Order for the Low Carbon Fuel Standard, Section 95484(c)(3)(C)1, "Specific Quarterly Reporting Requirements for Electricity."

The California Electric Transportation Coalition (CaETC) is pleased to provide the following comments on the Modified Regulation Order for the Low Carbon Fuel Standard, Section 95484(c)(3)(C)1, "Specific Quarterly Reporting Requirements for Electricity." The members of the Board of Directors of CaETC are: Southern California Edison, Sacramento Municipal Utility District; San Diego Gas & Electric Company; Pacific Gas & Electric Company<sup>1</sup>, and the Los Angeles Department of Water & Power.

CaETC supports the draft language which gives the ARB Executive Officer authority to approve alternatives to direct metering for residential charging stations before January 1, 2015.

However, we believe that this authority should not be limited to residential charging stations, but should be extended to all charging applications, including commercial, industrial, and public charging, if the regulated party can demonstrate to the Executive Officer's satisfaction that the alternative method is substantially similar to the use of direct metering. Accordingly, we ask that the restriction in the draft language limiting the authority of the Executive Officer to approve alternatives to direct metering of residential charging only be removed.

Thank you for this opportunity to provide comments. If you have any questions, please do not hesitate to contact me or Julee Malinowski-Ball at (916) 441-0702.

Sincerely,

A handwritten signature in black ink that reads "David L. Modisette".

David L. Modisette  
Executive Director

A non-profit association  
promoting cleaner, healthier air  
through the development and use of  
zero-emission electric vehicles,  
hybrid electric vehicles,  
electric mass transit buses and rail.

<sup>1</sup> PG&E does not necessarily agree with this recommendation and may be submitting separate comments.

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