

TRANSPORTATION ELECTRIFICATION PARTNERSHIP



May 10, 2024

Honorable Chair Liane Randolph and Honorable Board Members
California Air Resources Board
1001 I Street Sacramento, CA 95814

Subject: Support for Continuing and Evolving California Air Resource Board’s Low Carbon Fuel Standard Regulation as a Critical Tool for Meeting ZEV Goals

Dear Chair Randolph and Honorable Board Members,

We write on behalf of the [Transportation Electrification Partnership](#) (TEP) in support of the California Air Resources Board’s (CARB) Low Carbon Fuel Standard (LCFS) as a critical tool to advance the state’s transition to zero emission vehicles (ZEVs) across the light, medium, and heavy-duty sectors. Since its creation over ten years ago, the LCFS has spurred momentum towards the state’s climate goals, as well as Los Angeles’ regional goals, reducing greenhouse gas emissions and other air pollutants that disproportionately impact low-income and disadvantaged communities, and the program is needed to continue to advance electric vehicle adoption.

TEP is an unprecedented multi-year, multi-sectoral partnership focused on accelerating transportation electrification in the greater Los Angeles region by 2028, when the world turns its attention to our region as the host of the Olympic and Paralympic Games. Convened by the Los Angeles Cleantech Incubator (LACI), TEP’s 25+ members represent a range of stakeholders including local, regional and state government, regulators, utilities, industry leaders, labor organizations and startups. In our Zero Emission 2028 Roadmap, the Partnership set ambitious, but achievable targets for light-duty, medium-duty and heavy-duty ZEV sales as well as charging infrastructure installations to be achieved in LA County by 2028, including:

- 30% of light-duty vehicles on the road and 80% of vehicle sales to be electric, with 129,000 public and workplace chargers to support these vehicles,
- 20% of single occupancy vehicle trips shifted to zero emission public and active transportation,

- 60% of all medium-duty delivery vehicles to be electric, 40% of drayage trucks to be zero emission, and up to 95,000 charging stations deployed to support goods movement.

The LCFS program provides a stable source of funding and regulatory support to achieve these goals while growing the green economy in Los Angeles and beyond. It has also served as a key market signal for billions of dollars of investments in zero emission vehicles and infrastructure and will continue to attract large amounts of private capital to the state.

CARB's Advanced Clean Cars II, Advanced Clean Fleets, and Advanced Clean Trucks rules are spurring zero emission vehicle adoption; extending and strengthening the LCFS program will continue to provide essential support to meet the targets laid out in the regulations. As such, we applaud CARB's proposed 30% reduction in fuel carbon intensity (CI) by 2030 and 90% reduction in fuel CI by 2045, as a means of aligning with greenhouse gas emission caps under SB 32 and AB 1279. Further, we support CARB's pursuit of evolving the LCFS to meet the on-going needs of bolstering ZEV sales and the corresponding public and shared-private charging infrastructure buildout for the light-duty, medium-duty and heavy-duty segments of the ZEV market, while maintaining a core emphasis on equity.

For these reasons, we strongly support extending and strengthening LCFS to keep the Los Angeles region and California on track to reach our climate targets and ensure the equitable adoption of ZEVs for all. Please do not hesitate to reach out if you have any questions.

Thank you,

Matt Petersen
President and CEO

Los Angeles Cleantech Incubator (LACI)
Co-Chair, Transportation Electrification Partnership

Drew Murphy
CEO

Edison Energy
Co-Chair, Transportation Electrification Partnership