



May 3, 2026

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Suite 9000
Sacramento, CA 95814

Lauren Sanchez,
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95812

Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: EVCA Comments on Proposed Amendments to the Cap-and-Invest Regulations

The Electric Vehicle Charging Association (EVCA) is a trade association representing companies across the electric vehicle charging industry, including charging network operators, equipment manufacturers, and service providers. Our 18 members are working to deploy the reliable, accessible charging infrastructure that California's zero-emission vehicle transition requires, in homes, workplaces, public spaces, and the communities that need it most.

EVCA strongly supports the Cap-and-Invest Program and the Board's work to implement the requirements of AB 1207 (Irwin) in a timely fashion, assuring linkage with Washington and Quebec's markets. Cap-and-Invest is a cornerstone of California's climate policy and a critical source of investment in the clean transportation infrastructure our members build and operate. We appreciate CARB's continued stewardship of this program, particularly as California navigates significant ambiguity about the future of federal energy and transportation policy, and we remain committed partners in its success.

We thank CARB staff for the additional days to review the amendments. Given their scope and complexity, this additional time for public review enables more complete stakeholder engagement before final adoption. With the number of priorities that rely on the Cap and Invest program, and the benefits the state has and stands to realize from it, it is crucial to get this right.

We urge the Board to carefully evaluate the proposed amendments' potential effects on Greenhouse Gas Reduction Fund revenues. GGRF is the primary public funding source

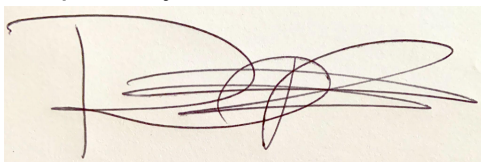
for California's EV charging infrastructure build-out — supporting programs that put chargers in low-income communities, along freight corridors, and drive the scale of deployment needed to meet the State's clean transportation transition milestones. [Early analysis suggests the proposed amendments could result in rapid near-term reductions](#) in GGRF proceeds, potentially of significant magnitude, driven in part by the structure of the new Manufacturing Decarbonization Incentive and, to a lesser extent, by proposed changes to utility climate credits. Any reduction would put at risk the sustained public investment that California's charging infrastructure market depends on, particularly as federal infrastructure funding faces growing uncertainty.

Should the MDI be retained as a program feature, CARB should revert the MDI to the structure proposed in the January ISOR, which funded the MDI by allocating allowances from future budget years.

The GGRF Expenditure Plan established by SB 840 (Limon) represents a hard-won framework for directing Cap-and-Invest revenues to California's most critical climate priorities, including the clean transportation and charging infrastructure investments that will define the next decade of EV growth. EVCA urges the Board to ensure that any amendments maintain GGRF revenue stability and consistency, sufficient to support the premise, promise, and provisions of SB 840. While revenue decline is an aspect of program design, the decline seen in early analysis is misaligned with the current stage of the clean energy and transportation transition.

EVCA looks forward to continued engagement with CARB on these issues and remains a committed partner in California's clean transportation future.

Respectfully,

A handwritten signature in dark ink on a light-colored background. The signature is stylized and appears to be 'Reed Addis'.

Reed Addis
Government Affairs