32122 Camino Capistrano, Suite 200, San Juan Capistrano CA 92675

11/10/25

Lauren Sanchez
California Air Resources Board Chair
California Air Resources Board
1001 I St, Sacramento CA 95814

RE: Amendments to the Low Carbon Fuel Standard Inclusion of Linear Generators for Book and Claim Accounting

Dear Chair Sanchez:

Ocean Pacific Energy Company (Ocean Pacific) designs and builds renewable fuel stations in California, focusing on providing innovative, reliable, accessible and affordable clean energy solutions. Ocean Pacific supports the proposed amendments to the Low Carbon Fuel Standard to allow for book-and-claim accounting of RNG to produce electricity for electric vehicle charging, if the electricity is generated using a linear generator.

However, we believe that the ability to utilize book and claim for RNG should apply to other onsite electricity generation options, without picking winners and losers. Ocean Pacific is currently considering the deployment of a fast and cost-efficient option to expand electricity charging capacity at targeted locations by installing natural-gas-powered generators on site and bypassing electrical grid connection.

Currently, the number of heavy-duty charging stations in California is well below the state's goal to meet the current charging demand. For instance, according to AB 2127 Second Electric Vehicle Charging Infrastructure Assessment[1], Kern, Merced and Riverside counties collectively have only 20% of the charging stations needed as of 2025. A major hurdle that negatively impacts the rate at which stations are being put into service is the lack of adequate utility power infrastructure. Utility power poses many challenges to station developers, including:

- Long delays in project development (up to several years)
- Less cost-effective
- More complex local permitting

Ocean Pacific is proposing to utilize onsite power generation and pipeline natural gas to overcome these hurdles. Primarily, developers can take advantage of widespread existing CNG infrastructure that has been in place for decades and is funded through state and local grants.

[1] Electric Vehicle Charging Infrastructure Assessment - AB 2127

If CARB accepts this methodology as a fuel pathway, it will be greatly beneficial to have access to book and claim accounting where renewable natural gas can be directed beyond the use of fossil natural gas. With the current LCFS natural gas market being approximately 95% renewable natural gas[2], any additional expansion would need to occur through the deployment of more natural gas fleets to replace LD and HD fossil-based options. However, if this does not occur, future expansion can still be realized in the conversion of natural gas to electricity in more than just linear generators in a timely and efficient manner of deployment.

Finally, this additional incentive would send a strong single to promote fast charging for heavy-duty vehicles and give confidence to developers that they will not forfeit grid electricity-based LCFS credits should they switch to onsite power options.

Greg Stevens

Greg Stevens, VP Engineering
Ocean Pacific Energy Company
32122 Camino Capistrano, Suite 200
San Juan Capistrano, CA 92675
Tel: 760.214.6805
Email: greg@oceanpacificenergy.com

[2] LCFS Data Dashboard | California Air Resources Board – Figure 2 & 3