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November 10, 2025

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Proposed Amendments to Low Carbon Fuel Standard Regulations

Mainspring Energy, Inc. ("Mainspring") appreciates the opportunity to submit comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulations. We strongly support the goals of the Low Carbon Fuel Standard (LCFS) and support the proposed amendments, which will ensure a level playing field for renewable electrical generation technologies, such as linear generators and fuel cells, as eligible for book-and-claim accounting of biomethane for electricity for electric vehicle charging.

Mainspring is a California-headquartered manufacturer of linear generators, which offer local renewable power that is dispatchable immediately. Mainspring's linear generator is a unique non-combustion capacity and energy solution that simultaneously addresses the critical need of reducing greenhouse gas and criteria pollutant emissions, while also enhancing grid reliability and resilience.

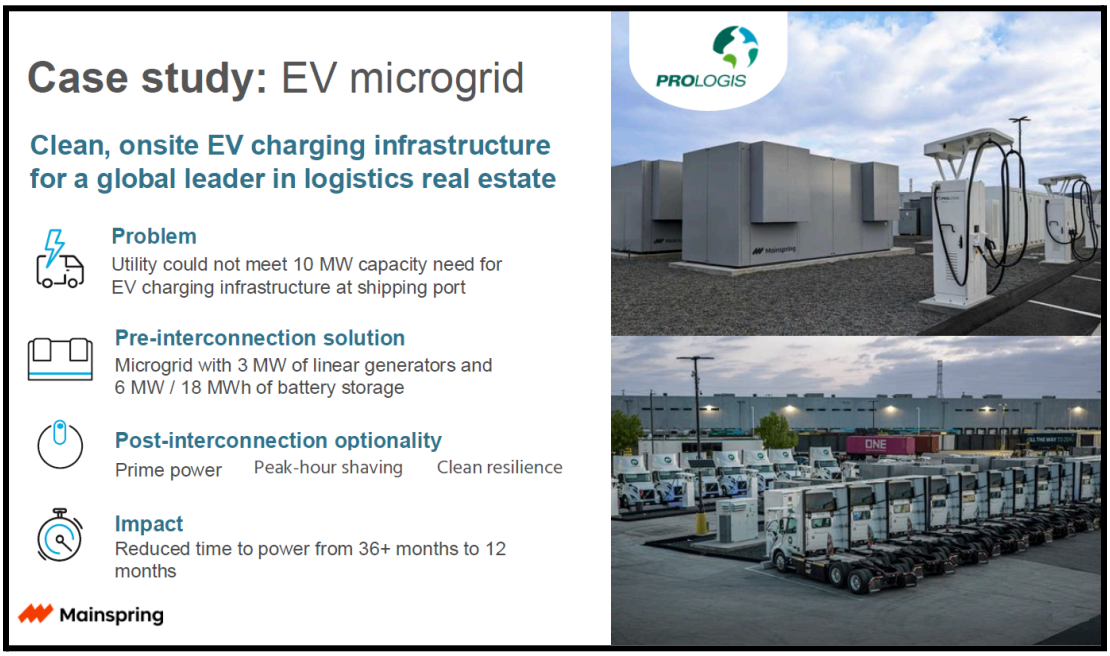
Mainspring supports staff's proposal to include indirect accounting of renewable natural gas (RNG) for LCFS reporting and crediting of electricity for vehicle charging produced by linear generators. This proposal will increase opportunities for near-term, low-emission electrification solutions to provide electricity vehicle fueling while charging station operators work with utilities to connect their sites to electricity distribution systems.

This proposal aligns with AB 1921 (Papan, 2024), which reinforces technology neutrality by explicitly defining linear generators using renewable fuels as "renewable electrical generation facilities" eligible under the California Renewables Portfolio Standard Program and other state clean energy initiatives.[1] Linear generators provide the same capability as fuel cells to produce electricity from renewable fuels for EV charging, and therefore should be similarly included under the LCFS program.

Modular and scalable, Mainspring's linear generators can be deployed near load, either customer- or grid-sited, with the ability to immediately generate electricity from a range of renewable fuels. Mainspring's inverter-based technology offers a full range of valuable grid benefits including fast (and nearly unlimited daily) starts/stops, a wide dispatch range from minimum to maximum load at high

[1] AB-1921 Energy: renewable electrical generation facilities: definition. (Papan, 2024). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1921

efficiencies, quick ramping, and, as necessary, on-site fuel storage. Linear generators have been deployed to enable large-scale fleet electrification by end use customers such as Prologis Mobility and Maersk. As part of Prologis' EV microgrid, linear generators provide resiliency and reliability for charging their customer's 96 all-electric heavy duty drayage trucks while simultaneously improving local air quality for the surrounding disadvantaged communities in Los Angeles County. The high dispatchability of the linear generator makes it ideally suited for providing electricity for EV charging applications versus technology that must remain running at all times.



Source: Mainspring Energy

We applaud the continued and sustained advancement of California's zero-emission vehicle goals for the transportation sector and believe that the Low Carbon Fuel Standard Program is a necessary tool for incentivizing deployments of technology solutions such as linear generators for helping the State of California achieve its carbon reduction targets.

Thank you for the opportunity to submit comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulations. We strongly support staff's proposal and urge the Board to adopt the proposed amendments.

Sincerely,

Kent Leacock

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