Alexis Moch

Please see the attached document for Prologis's comments. Best.

November 10, 2025

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

Re: Support for Proposed LCFS Amendments – Renewable Natural Gas Book-and-Claim for Linear Generators

Dear Chair Sanchez:

On behalf of Prologis, I write to express our strong support for the proposed amendments to the Low Carbon Fuel Standard (LCFS) that would permit indirect (book-and-claim) accounting of renewable natural gas (RNG) for LCFS reporting and crediting of electricity generated by linear generators used for electric vehicle (EV) charging. We appreciate the Board's responsiveness to stakeholder feedback and commend staff for advancing this pragmatic update, which will expand access to low-carbon, dispatchable electricity for electric truck refueling.

We want to emphasize the importance of Table 8 inclusiveness of linear generators as well as part of the update. In prior comments we had recommended adding a -300 CI temporary pathway for fuel cells and linear generators but only fuel cells were included in response.

Fuel	***Feedstock***	***Process Energy***	***CI (gCO_2e/MJ)***
Low-CI electricity produced by fuel cell	Biomethane from Dairy and Swine Manure Source	N/A	-300

As we emphasized in prior comments,[1] linear generators offer a scalable, low-emission, and rapidly deployable solution for powering heavy-duty fleet charging hubs, which is critical for meeting California's climate and air quality goals. By recognizing this technology within the LCFS framework, CARB is providing a clear and equitable pathway for projects that can accelerate near-term fleet electrification while maintaining the program's environmental integrity.

Medium- and heavy-duty (MHD) charging projects are in a difficult position. They are among the most energy-intensive industrial facilities in California, yet must be built on accelerated schedules to meet fleet electrification goals and avoid stranding EV assets. Projects in this predicament often face protracted timelines for utility interconnection or partial energization due to insufficient power availability. In such cases, Prologis has worked with our customers to deliver on-site generation solutions paired with storage to provide that power with the added benefit of operational resiliency once grid service is established. Because of the exceptional energy intensity of industrial MHD charging hubs and limited site footprints, dispatchable, power-dense on-site generation such as fuel cells or linear generators can be the only technically feasible option capable of meeting both real estate and energy delivery constraints.

[1] https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7539-lcfs2024-VDdSNVMgUmMHXgBi.pdf

Prologis has seen these dynamics firsthand through our development of a charging depot in Torrance, the largest heavy-duty electric truck charging site in the United States. That project was delivered in months rather than the multiple years it would have taken under standard utility upgrade timelines. Using South Coast Air Quality Management District permitted linear generators, the facility achieves approximately 97 percent lower NOx emissions than an equivalent diesel fleet, demonstrating that this technology can deliver immediate air-quality benefits along goods movement corridors while enabling rapid zero-emission fleet deployment. While linear generation is not a low-cost solution and will not be appropriate or economical for every customer, it is an essential option to have available, particularly for projects facing long grid interconnection delays or operating in constrained utility territories where other pathways are infeasible.

Until now, these projects have been disadvantaged under the LCFS because book-and-claim crediting for biomethane-to-electricity pathways was restricted to fuel cells. As a result, biomethane in the EV charging sector – through linear generation – have been precluded from receiving credit, even though these systems have similar efficiencies to fuel cells. The proposed amendment to § 95488.8 corrects this inequity by ensuring that linear generators can access LCFS crediting on the same basis, consistent with both federal definitions of fuel cells in Title 26 U.S.C. § 48(c) and with California AB 1921 (2024), which added linear generators using renewable fuels as eligible under the state's Renewable Portfolio Standard.

In doing so, CARB is aligning the LCFS with current statutory and technological realities. The book-and-claim structure ensures that RNG attributes are verifiable and fungible across the gas pipeline network, while recognizing the lifecycle greenhouse gas reductions achieved by using RNG in linear generators to supply vehicle charging electricity. Importantly, CARB's own analysis in the rulemaking notice concludes that this amendment will not increase NOx or PM emissions, since linear generators are already in use at EV charging sites and the change simply enables recognition of their renewable fuel attributes.

Prologis thanks the Board and staff for their continued leadership and engagement on this issue, culminating with the formal recognition of linear generators as eligible under the LCFS's book-and-claim framework. This thoughtful and necessary update will enable scalable, near-term electrification of truck fleets while maintaining California's environmental standards and advancing the state's broader carbon-neutrality goals.

Thank you for considering these comments, and Prologis welcomes the opportunity to further elaborate on our views with the Board and staff. Please do not hesitate to contact me at amoch@prologis.com or 571-895-5763 for more information or to discuss our comments.

Respectfully submitted,

Alexis Moch
Vice President, Government Affairs
Prologis