

**TO: Office of Management and Budget, Environmental Protection Agency**

**FR: EVgo**

**RE: Meeting on November 22, 2022**

**DA: November 21, 2022**

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This memorandum provides a summary of points made during our meeting discussing RIN 2060-AV14, Volume Requirements for 2023 and Beyond Under the Renewable Fuel Standard Program.

### **Summary**

As the administration finalizes regulations to open an electric renewable identification numbers (E-RIN) pathway within the Renewable Fuel Standard (RFS) program, EVgo looks forward to the opportunity to share information on empirical and verifiable methods that should be used to allocate public charging station owners their portion of any E-RIN.

Public charging owners and operators should be allocated the portion of credits which occur on a public charging network. This will ensure public charging station owners and operators are included in the E-RIN value chain, which will be necessary to better incentivize investment in charging infrastructure, consistent with the Biden Administration's goals of building 500,000 electric vehicle charging stations.

Any program which does not establish a pathway for public charging station owners to generate E-RINs removes any inducement from the RFS for additional investment in charging infrastructure, contrary to the Administration's goals for rapid station build-out. This is important because public fast charging infrastructure is the most capital intensive and would only realize the most marginal of downstream benefits if other entities like automakers are allocated 100% of the value of the E-RIN. The EPA identified public charging station build-out as a program priority in its 2016 proposed rule which addressed E-RINS<sup>1</sup> via the Renewable Energy Growth Enhancement Support Rule.

The charging industry can also produce verifiable and empirical records from networked charging stations to provide a session-level accounting of charging events, including identifying the make the vehicle for each session to prevent any double counting of these E-RINs. This enables public charging station owners to receive value from E-RINs generated at their stations in any empirical and verifiable manner. Even if vehicles are designated as primary recipients, this empirical data can be used by EPA to allocate the appropriate portion of public charging E-RINs to public charging station owners and operators.

Allocating E-RINs to public charging station owners and operators best achieves EPA's goal to incentivize charging investment and allocate E-RINs based on empirical records, and EVgo looks forward to discussing this with you in more detail.

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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2016-11-16/pdf/2016-25292.pdf>