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**Li-Cycle Comments on Distributed Energy Resources (DER)
Research Roadmap**

Additional submitted attachment is included below.

Li-Cycle Comments on Distributed Energy Resources (DER) Research Roadmap

We appreciate the opportunity to comment on the DER Research Roadmap. As an industry leader in lithium-ion battery recycling and resource recovery, Li-Cycle is highly interested in supporting research initiatives that will continue to advance the state of the industry. Li-Cycle has developed and validated a unique and sustainable process for recycling all types of lithium-ion batteries – including those used in electronic devices, electric vehicles, and energy storage – and are now the largest lithium ion battery recycling company in North America.

Still, the market is in its relative infancy, and only a small portion of lithium-ion batteries are recycled in a sustainable way. Accordingly, we strongly support the DER Research Roadmap proposal on Energy Storage Recycling and encourage the Commission to elevate it to a high priority research item with a near-term time horizon.

This may seem like a longer-term issue – as the market for electric vehicles and energy storage is expected to grow significantly in the future, and a glut of batteries at their end-of-life will follow – however, policies and facilities to accommodate recycling growing volumes of lithium-ion batteries are being designed now. Our company is actively planning its expansion in North America to accommodate this growing market, and California is actively planning its policy framework to achieve its goal of recycling 100 percent of vehicle batteries through the Lithium-ion Car Battery Recycling Advisory Group convened by CalEPA. That work group will submit recommendations to the legislature on policies to support lithium-battery recycling by April 2022, so now is the time to conduct research to inform those recommendations.

Additionally, research supporting energy storage recycling can support other efforts in the state underway right now – including developing local supplies of lithium and other critical minerals, reducing the cost of batteries to support zero emissions transportation and clean energy, and developing more effective policies and strategies to facilitate recycling of batteries used in consumer electronics to keep them out of the waste stream, where they are causing fires and disrupting waste management and recycling operations.

Battery recycling is a critical and near-term issue to support California’s clean energy transition, and the DER Roadmap can help ensure it happens in as environmentally sustainable and economically beneficial manner as possible. We strongly support the proposal to include research related to energy storage recycling in the DER Roadmap, and we encourage the CEC to elevate it to a higher and near-term and near-term priority. Doing so will support the state’s existing efforts around battery recycling and lithium supply and can accelerate the state’s clean energy transitions. We look forward to the opportunity to continue working with you on this issue and helping address related research issues identified by the state.