



November 12, 2021

Debebe Dererie
Washington Dept. of Ecology
300 Desmond Drive SE
Lacey WA 98503

RE: Washington Clean Fuels Program Rulemaking

Dear Mr. Dererie,

I write you today on behalf of Forth, a nonprofit trade association that advocates for the advancement of electric, hydrogen, shared, smart, connected, and autonomous mobility. Forth was pleased by the passage of House Bill 1091 in 2021, paving the way for the Clean Fuels Program rulemaking your department has recently launched. As you begin to consider the design of the program, we wanted to take a moment to pass along a few ideas that we hope will warrant your consideration.

Backstop Aggregator: First, we urge Ecology to adopt a “Backstop Aggregator” model for unclaimed Clean Fuels credits from home charging, as has been done in Oregon’s program. As you know, Oregon’s program provides that if a utility chooses not to opt in and administer its own credits, they are awarded to a Backstop Aggregator chosen through a competitive RFP process. In Oregon, Forth (through its 501(c)(3) arm the Forth Mobility Fund) was chosen by Oregon DEQ as Backstop Aggregator in 2017. Since we began administering those credits in 2018, Forth has monetized nearly \$2 million in credits and directed it to deliver statewide consumer outreach, engage utilities on the benefits of electric vehicles, and implement pilot projects in targeted areas of Oregon. Forth also constantly seeks other opportunities and funds to advance transportation electrification and manages a variety of projects that leverage Clean Fuels funds including contracts with utilities, U.S. Department of Energy projects, and partnerships with regional environmental groups.

We noted from Ecology’s October 6 webinar presentation that the agency “may designate an aggregator to use unclaimed credits to promote transportation electrification.” Given the successes we have seen in Oregon through the Backstop Aggregator, Forth believes that Washington would see similar benefits from building such a function into its program. There are certainly benefits to be obtained by coordinating those investments through a central statewide program instead of administering them utility by utility. We also wholeheartedly agree with the suggestion from the October 6 presentation that supporting overburdened communities should form a major focus of the Backstop Aggregator’s work. It is important to note, however, that this role is likely to be temporary; in Oregon, for example, utilities have now claimed virtually all eligible credits and there is no longer significant funding generated by this mechanism.

Clean Mobility Fund: An interesting long-term idea to support overburdened communities and maximize the impact of clean fuels credits would be to establish a central structure for identifying and delivering equitable electric transportation efforts of statewide importance in Washington to accelerate electric

transportation across Washington, as well as create efficiencies in spending on common interests. Under such a scenario, electric utilities would voluntarily dedicate a portion of the proceeds from Clean Fuels credits that flow to them for home charging of electric vehicles to a central fund to support coordinated high-priority and equity-focused program investments that are best organized at a state level.

We recognize that the enabling legislation already requires that 50% of utility revenue must be spent by utilities on a specific list of transportation electrification programs or projects to be determined later by Ecology and WSDOT. Either in conjunction with such a list or with regard to the other 50% allocated to other TE projects in utilities' service territories, we believe a central fund could help ensure that key transportation electrification work is conducted in a coordinated statewide fashion, rather than designed and delivered utility by utility. Forth thus suggests that Ecology consider the possibility of a central Clean Mobility Fund to identify, develop, and manage those projects and programs where the need for regional coordination creates efficiency and consistency, including:

- Coordinated regional consumer education and outreach campaigns, such as advertising, dealer outreach and engagement, ride and drive events, etc.
- Funding of community-based projects that serve overburdened and historically underserved communities, including rural areas and frontline BIPOC communities.
- Projects of regional significance that transcend individual utility service territories (e.g., filling gaps in regional charging networks, electrification of long haul trucking corridors)

Of course, there are many administrative details that would need to be worked out to address oversight and program funding for such a function. Forth has some ideas along those lines and would be happy to discuss in further detail at the appropriate time. For now, we simply wanted to raise the idea as a topic for potential future consideration.

In any event, Forth is thrilled to finally have a Clean Fuels program on the horizon in Washington and we are excited to work with Ecology and other stakeholders to help shape a program to advance equitable transportation electrification in the state. We look forward to seeing the draft rule later this month and engaging more deeply as the rulemaking proceeds. Thanks for considering our comments and please let us know how we may be of assistance moving forward.

Sincerely,



FORTH Empowering Mobility

Rhett Lawrence

Pacific Northwest Policy Manager

rhettl@forthmobility.org | C: 503-490-2869

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