

# Seattle City Light

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Washington Department of Ecology  
300 Desmond Dr. SE  
Lacey, WA 98503

Via Public Comment Form @ecology.wa.gov

The City of Seattle, its municipally owned utility, Seattle City Light (SCL) and the Office of Sustainability and Environment (OSE) appreciate the opportunity to provide feedback on the Clean Fuels Program (CFP) rulemaking process (Chapters 173-424 WAC and 173-455 WAC). The City of Seattle has made a commitment to becoming carbon neutral by 2050. Transportation accounts for sixty percent of Seattle's greenhouse gas (GHG) emissions, thus transportation electrification (TE) is a key climate strategy to reach our goals. With a service territory of over 900,000, SCL is one of the nation's largest publicly owned utilities and with our strong hydroelectric power supply, one of the cleanest.

Seattle strongly supports a robust CFP that reduces GHG emissions, provides investments in underserved communities, and encourages the expansion of TE. The City of Seattle has adopted a citywide TE Blueprint to electrify transportation as well as an utility investment strategy with input from communities across the city and service territory. We feel strongly that we can provide valuable insight into the CFP rulemaking process to best ensure that the program works across the state.

Our comments focus on a few key components:

## EV Credits

Electric utilities have a strong history and commitment in providing services to all customers, including those in underserved communities. Electric Vehicle Service Providers (EVSP's) and Electric Vehicle (EV) manufacturers are not required by law to reinvest revenues in Washington State projects that reduce GHG or reinvest in underserved communities and we do not believe they will do so.

Capacity-based crediting pathways should be developed for DCFC's.

The program should begin in January 2023 to begin to reduce GHG and access new federal funding programs

## Residential Electric Vehicle Charging

Base and incremental credits for EV charging should go to the utility, who is the fuel supplier and not shared with electric vehicle manufacturers, like the Oregon program.

Multifamily properties should be considered residential charging, and utilities should receive the

credits from charging like California's program.

Residential charging stations should not be required to be separately metered to generate credits. Most home charging is not separately metered, and this would require the purchase of costly equipment that is not necessary to fuel the vehicle. This is an equity issue where only wealthier homeowners can afford this equipment, further disincentivizing low-income EV usage.

#### Non-Residential Electric Vehicle Charging

The station owners should receive the first right of refusal for credits. If station owners decline credit ownership, then utilities should be the credit owners.

The non-residential charging section lists two distinct entities (i.e.,- station owners and EVSPs) as being eligible to generate credits. This lack of clear delineation creates confusion and uncertainty related to who is legally authorized as the credit-generating entity. In all cases, only one entity should be clearly designated, with other entities in succession if the first entity chooses not to participate.

#### Carbon Intensity (CI)

The Carbon Intensity (CI) for electric utilities should be based on their unique mix of generation resources.

The methods and equations used to develop each utility's CI score should be based on and consistent with existing methods used by the state for other emissions reporting. We recommend Department of Ecology collaborate with the Department of Commerce to adequately assess and develop this approach.

#### Fixed Guideway Systems

Transit operators should retain all credits from charging transit buses, regardless of the method of charging (overhead lines vs. Electric Vehicle Service Equipment).

Thank you again for the opportunity to provide comment and please feel free to reach out if you have any questions.

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