



April 28, 2022

VIA ELECTRONIC FILING

Rachel Assink
Rulemaking Lead
Washington Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Re: Neste Comments on the Draft CI Tables for Washington Clean Fuels Standards

Dear Ms. Assink:

Neste appreciates the opportunity to provide these comments on the Washington Department of Ecology's (Ecology's) "Draft CI Tables for Washington Clean Fuels Standards" that was provided on April 26, 2022 via email. Given the importance of these tables when setting the carbon intensity (CI) standards, it is important that the general public be provided sufficient time to review the tables. Ecology has only provided until April 28, 2022 to submit comments, a very short two day review for such an important component of this regulation. Hopefully there will be more opportunities to comment on these tables.

Neste completed a high-level review of the Washington CI tables and determined they are generally consistent with Oregon's CI tables, with the exception of the CI's for hydrogen that are listed in Table 4, "Washington Carbon Intensity Lookup Pathways Table". The table below highlights these CI differences, and Neste would like to understand what is driving these differences given that Washington supplies Oregon with most conventional fuels.

	Oregon Carbon Intensity Values (gCO₂e/MJ)	Washington Carbon Intensity Values (gCO₂e/MJ)	Difference from Oregon (%)
Compressed H ₂ produced in Oregon/Washington from central steam methane reformation of North American fossil-based NG	120.68	112.69	-7%
Compressed H ₂ produced in Oregon/Washington from central steam methane reformation of biomethane (renewable feedstock) from North American landfills	116.76	92.71	-21%

We appreciate your consideration.

Oscar Garcia
West Coast Regulatory Affairs Manager
Neste US, Inc.