

Steve Taylor

Cowlitz Public Utility District No. 1 (Cowlitz PUD) appreciates the opportunity to comment on the rulemaking efforts underway to implement the Clean Fuels Program (Chapters 173-424 WAC and 173-455 WAC). Cowlitz PUD supports the comments submitted by Seattle City Light (December 9, 2021), particularly related to the allocation of credits generated by electric vehicle charging. The statute requires electric utilities to invest clean fuel credit revenue directly into transportation electrification efforts within their respective service areas, unlike Electric Vehicle Service Providers and Electric Vehicle manufacturers. Local utilities are incentivized by receipt of EV charging credits to make investments where they will be most effective in increasing EV adoption and charging, reducing emissions associated with their generation portfolio, and aligning the addition of new electric load to non-peak hours resulting in efficient use of capacity resources.

Cowlitz PUD recommends that Ecology adopt Oregon's approach to credit allocation where electric utilities (as the fuel supplier) receive the base and incremental residential EV charging credits rather than electric vehicle manufacturers. Multi-family properties should be considered residential charging with the credits being allocated to electric utilities as per California's program.

Credits generated from non-residential EV charging should designate the charging station owners as the recipients, or provide them a right of first refusal. If station owners decline, then the electric utility should be the next entity in line.

Electric utilities' Carbon Intensity should be based on their specific generation fuel mix, and consistent with the existing methods used by Washington State for emissions reporting. Ecology should consult with the Department of Commerce to adequately develop and assess the approach.

Cowlitz PUD thanks the Department for its level of engagement with stakeholders during this rulemaking process. We look forward to seeing further drafts of the rule language and will provide additional comments at that time.

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