



Jason Alberich
Abbey Brown
Joel Creswell
Debebe Dererie
Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

November 24, 2021

RE: Comments on the Washington Clean Fuels Program Rulemaking

North West Handling Systems, Inc. (NWHS) is a local Washington company. We have been in the business of providing material handling solutions to our customers for the past 50 years. We take great pride in the fact that we are a premier Crown Electric Forklift dealer in the Pacific Northwest.

In addition to selling electric forklifts to various businesses in the PNW, we also maintain a fleet of electric forklifts for customers. Some of our customers do not want to make the large upfront financial commitment of owning and maintaining electric forklifts and would rather rent or lease them from us as needed. NWHS has made significant financial investments, in the tens of millions of dollars, in purchasing and maintaining a fleet of electric forklifts for use by our customers.

We fully support your decision that the first priority for credit generation for electric forklifts is with the “fleet owner”. The “fleet owner” is the one who has made the large upfront investment in acquiring the fleet of electric forklifts. Our customers are very price/cost sensitive and focused on cost reduction. The ability to generate credits will help fleet owners offset some of the high cost of equipment acquisition and further promote the use of electric forklifts.

We are concerned that some out of state “credit aggregators” are submitting comments to Ecology, requesting that the credit generator for electric forklifts be the “fleet operator”. These credit aggregators have found a niche market to tap into and profit from the dispersed nature of fleet operators, charging high fees and have a credit marketing, selling process that is not transparent. We sincerely urge Ecology not to give into requests by “credit aggregators” to change who has first priority to generate credits for electric forklifts.

We look forward to working with you during the rulemaking process and providing additional comments and feedback in the coming months. Thank you.

Sincerely,

Rupesh Sansgiri, CPA
CFO | North West Handling Systems Inc.
1100 SW 7th St., Renton, WA 98057
Phone: 425-255-0500 | Fax: 425-228-6946
rupeshs@nwhs.com | www.nwhs.com

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