City of Everett, WA

173-424-530 says:

- (3) Credit seller requirements. When parties wish to transfer credits, the credit seller must initiate an online "credit transfer form" provided in the WFRS and must include the following:
- (a) The date on which the credit buyer and credit seller reached their agreement;
- (b) The names and FEINs of the credit seller and credit buyer;
- (c) The first and last names and contact information of the persons who performed the transaction on behalf of the credit seller and credit buyer;
- (d) The number of credits proposed to be transferred; and
- (e) The price or equivalent value of the consideration (in U.S.

dollars) to be paid per credit proposed for transfer, excluding any

fees. If no clear dollar value can be easily arrived at for the transfer, a price of zero must be entered and a qualitative description of

the transaction's valuation must be entered in the seller's notes field.

In section (e), specifically, it says: "The price or equivalent value of the consideration (in U.S. dollars) to be paid per credit proposed for transfer"

How the price or equivalent value per credit is determined is not explained here. Recommend that there be more specific direction or a chart explaining how much each credit is, based on the public utility utilized, i.e. 1 kWH from Snohomish County PUD #1 = \$"X" dollars for the month of "TBD". Otherwise, the cost-benefit analysis of installing "smart" vs "dumb" chargers and metered vs. non-metered chargers cannot be completed. A low-use charging station will generate less credits than one with more use, thus there is a break-even point for being willing to pay for different types of installations.

If the cost of a credit is going to follow a bid process or a "hand-shake agreement" between credit generators and deficit generators, then for municipal and county governments, there has to be a way to show the value per credit is "fair and reasonable". The bidding process has to be fair and open to all deficit generators, if that's what's being used, and properly documented (with copies given to the credit generator for their files). If it's a "hand-shake agreement", then that process won't be allowed per our local policies.