

Rivian

Thank you. Good morning, and thanks for the opportunity to provide comment today. My name is Tom Van Heeke, and I'm representing Rivian, a manufacturer of all electric adventure vehicles, including the R1T pickup, R1SSUV, and a delivery van for Amazon. We are also building a national network of charging stations, including on public lands. Rivian is in generally strong support of the draft rule. Clean fuel standards are proven to reduce emissions and support EV market growth, and we applaud the team at Ecology for its hard work in developing the regulations to administer Washington's program. This policy will play a key role in the state's response to climate change, and will contribute substantially to decarbonizing the transportation sector. Rivian plans will provide detailed written comments following these remarks, but we do wish to take this opportunity to highlight three specific issues with the draft rule that we believe could limit the regulation's potential. One, we find the draft rules language governing residential-based crediting for EVs to be a missed opportunity. We continue to believe that an approach leveraging vehicle telematics, and thus providing empirical charging data is a superior approach that would enhance the program's environmental integrity, and incentivize accelerated ED deployments. Ecology should revisit its earlier analysis of option three for base credits. If Ecology moves forward with the proposed approach in the draft rule, Rivian respectfully urges the agency to consider providing automakers with preference for generating incremental credits. Two, Ecology should align its requirements for qualifying DCFC infrastructure under the capacity-based credit pathway with proposed federal NETI guidelines. Specifically, Ecology should [inaudible 00:21:05] the CCS connector for infrastructure to be creditable under the program, including a CHAdeMO connector should not be required. Only one BEV model sold nationally in the us is ever reliant on CHAdeMO for fast charging. More than half of those sold to date were sold between model years 2010 and 2015. Requiring CHAdeMO connectors will increase infrastructure costs without any meaningful benefit for EV uptake in the current market. The CCS connector should be sufficient on its own to qualifying installation for capacity-based credits. Three, Ecology should allow credit generators to earn incremental credits using Rex from generators disservice beginning in 2022 not 2023. Our written comments will explain more fully, but we believe that the practical implications of the 2023 requirement mean that it would not serve program goals. Thanks again to [unintelligible 00:21:57] engagement with stakeholders throughout this process, and for this opportunity to speak. We look forward to submitting written comments in the remainder of the rule-making process. Thanks.