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VIA ELECTRONIC SUBMISSION

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

RE: Comments on Proposed Chapter 173-424 WAC, Clean Fuels Program

Dear Ms. Assink:

Suburban Propane Partners, L.P. (“Suburban Propane”) writes in regards to the proposed rule Chapter 173-424 WAC, the Clean Fuels Program (“CFP”). Suburban Propane has been serving customers for almost 95 years and is the nation’s third-largest propane retailer with operations in 42 states. In Washington, we currently have 58 employees at 13 locations serving more than 12,600 customers.

Suburban Propane generally supports the CFP, which adopts much of California’s Low Carbon Fuel Standards (“LCFS”), and designates entities that own the fueling equipment through which traditional propane is dispensed to motor vehicles as the first fuel reporting entity. However, we recommend removing the carveout under WAC 173-424-210(2)(d)(ii), which makes a forklift fleet owner the first fuel reporting entity for traditional propane used in forklifts. Instead, the CFP should remain consistent with the LCFS and keep the owner of the fueling equipment through which traditional propane is dispensed the first fuel reporting entity for all types of vehicles, including forklifts.

WAC 173-424-210(2)(d)(ii) would promote inefficiencies, as it creates a carveout for only one particular type of vehicle. The lack of a clear standardization with respect to those designated as first fuel reporting entities muddies the waters by creating an exception to credit generation for propane dispensing equipment owners for no discernible reason.

In addition, designating forklift fleet owners as the first fuel reporting entity does a disservice to those entities. Navigating through the credit market to unlock the program’s incentives is a difficult undertaking.



Outside of major companies, forklift owners likely do not have the time, knowledge, or resources to work through the process of receiving credits for propane, leaving money on the table and potentially disincentivizing the production and use of lower carbon fuels. Fuel retailers and dispensers, including Suburban Propane, have experience with clean fuel standards and their related credit markets.

Based on the foregoing, we urge you to remove WAC 173-424-210(2)(d)(ii) from the CFP rules and designate the owners of propane dispensing equipment as the first fuel reporting entity for all types of vehicles. If you would like, we would be happy to set up a meeting with your team and Suburban Propane leadership to discuss this and other CFP-related matters. Thank you for your consideration.

Sincerely,

/s/ Paul M. Rozenberg

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Suburban Propane Partners, L.P.