

Northwest Alliance for Clean Transportation

This is Alex Shay. I represent the Northwest Alliance for Clean Transportation. We advocate for increased use of CNG, and RNG, and the medium and heavy-duty transportation space throughout the Pacific Northwest. Thanks to everyone for the hard work that you all have put into this rule-making process. We have two specific concerns with regard to the draft rule. The first concern has to do with advanced crediting, and the second concern has to do with eligibility for applying for an individualized energy economy ratio. If we're reading the draft rule correctly, only battery electric propulsion technologies are eligible for advanced crediting. If we're reading the rule correctly, only battery, electric and hydrogen fuel cell propulsion technologies may apply, or are eligible to apply for an individualized energy economy ratio. We do not see a need to limit the eligibility for advanced crediting or application for individualized energy economy ratios to specific technologies. One of the things that we value about the work that the Washington state department of Ecology does with regard to the clean fuel standard is that it seems as though for the most part, the department takes a technology agnostic approach toward reducing greenhouse gas emissions in the transportation space. By singling out battery electric, propulsion technology as eligible for advanced crediting, as well as battery electric and hydrogen fuel cell propulsion technologies as eligible to apply for an individualized energy economy ratio, this doesn't seem to us to constitute a technology-agnostic approach towards reducing greenhouse gas emissions in Washington State's transportation space. We encourage the department to review this, and to consider inputting language that would indicate that all technologies that reduce greenhouse gas emissions may be eligible both for advanced crediting, as well as to apply for their own individualized energy economy ratio. We've submitted comments in writing. I've been in communication with Rachel, thank you for that. I'll be happy to take your comments via email when appropriate. Thank you.