

Washington Independent Energy Distributors

Thank you for the opportunity to present comments on behalf of the Washington Independent Energy Distributors (WIED) regarding the proposed fee for participating in the Clean Fuel Standard. WIED is a non-profit trade association serving the needs of the liquid fuels distribution market. Our membership represents more than 90% of the distributors in Washington state, selling gasoline, diesel, renewable fuels, lubricants and heating oil.

As currently proposed, the initial fee (in 2023) for participating in the Clean Fuel Standard program would be distributed equally between all participants. We have concerns with this approach because it will inequitably impact smaller distributors who would pay the same amount as much larger suppliers, regardless of gallons supplied and the carbon intensity of those gallons. WIED believes a more equitable method for setting the fee would be what Ecology has proposed beginning in 2024 which is that all participants will pay a small, flat participation fee and deficit generators will pay an additional fee based on the quantity of deficits they generate. We believe that the proposed fee structure in 2024 should be used beginning in 2023 and beyond.

Thank you for your consideration.

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