

Coleman Oil Company, LLC

State of Washington
Department of Ecology
<https://aq.ecology.commentinput.com/?id=Hkm67>

To Whom It May Concern,

Thank you for the opportunity to comment on the State of Washington Department of Ecology (ECY) Clean Fuel Standard (CFS) proposed program fees.

Coleman Oil Company, LLC would like to bring to the department's attention our concerns regarding the unequitable structure of the current 2023 proposed program fees.

The 2023 proposed fee estimates that deficit generators will pay 95% of the program cost, in 2023 that is estimated to cost \$77,074.00. The flat fee structure proposed imposes a disproportionate impact on small and medium sized generators. As proposed, the CFS program fee for participants is assigned at the entity level without regard to the entity's total carbon emission activities. This approach does not align with the logic of WAC 173-424 Clean Fuels Program Rule, which applies the detriment to the (carbon-intense) fuel gallon.

It would be the recommendation of Coleman Oil Company, LLC that any fees charged should be assessed in an equitable format.

Thank you again for the opportunity to provide feedback on potential changes to the CFS proposed program fees, we welcome continued engagement with the ECY team.

Sincerely,
Ian M Coleman
Ian M. Coleman
President
Coleman Oil Company, LLC
www.colemanoil.com



March 3, 2023

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Department of Ecology
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RE: WA ECY CFS Proposed Program Fees, Public Comment

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