

March 24, 2024

Adam Saul, CFS Rule Lead
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504

RE: 3Degrees comments on Rulemaking - Informal Public Comment Period for Chapter 173-424 WAC, Washington Clean Fuels Standard (CFS)

Dear Adam Saul and CFS Team,

3Degrees Group, Inc. (3Degrees) appreciates this opportunity to submit comments to the Department of Ecology (Ecology) on the forthcoming amendments to the CFS rule.

3Degrees is a global climate and clean energy solutions provider and is a strong supporter of the CFS program. We participate in the program as a designated reporting entity on behalf of a variety of opt-in parties with light-duty electric vehicle (EV) chargers, electric forklifts, hydrogen forklifts, and heavy-duty EV fleets. We are also an active fuel pathway developer.

We offer the following comments in response to the stakeholder meetings held on February 22 and 28th.

3Degrees recommends that Ecology ensure any new verification requirements take into account the practical differences between technology types.

Should Ecology look to incorporate a site visit requirement into its new third-party verification provisions for electricity crediting types, as California has proposed, it is imperative that a mechanism be put in place to allow for sampling of sites - especially for EV chargers enrolled in the program. It would not be reasonable to expect individual site visits for the thousands of disparate sites containing fueling supply equipment (FSE), particularly for aggregators. Furthermore, conducting site visits of all metered residential charging poses practical and privacy implications for homeowners that may outweigh assurances gained by a visual inspection of the meter.

We request that Ecology ensure that any language regarding site visits provide that, in the case of designated reporting entities or entities with more than a certain number of registered FSE, verifiers need only visit the designated reporting entity's central location for recordkeeping plus a subset of facilities based on a carefully-crafted sampling plan. The nature of EV charging equipment is such that the verification process could require multiple months of continuous travel to achieve 100% visitation of all sites with registered FSE. We also recommend that Ecology exempt residential charging from site visit requirements. It is crucial that any new

verification requirements do not discourage EV participation in the program, especially for entities with a large number of distributed FSE.

Book-and-claim biomethane opportunities should remain unaltered.

We recommend that Ecology avoid making changes to the geographic eligibility or credit generation potential for book-and-claim of biomethane at this time. From a credible claims perspective, national sourcing continues to be a logical geographic boundary. Once RNG enters a pipeline, it may essentially be delivered anywhere across the continent. If Ecology seeks to move forward with biomethane geographic eligibility or deliverability requirements, we recommend implementing the proposal on an extended timeline to allow participants to plan for and accommodate the change.

3Degrees appreciates this opportunity to provide feedback and we look forward to continuing to work with Ecology on the development of the CFS. Please reach out with any questions or for further discussion.

Sincerely,

/s/ Helen Kemp

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