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March 24, 2025

Washington State Department of Ecology
300 Desmond Dr SE
Lacey, WA 98503

Re: Clean Fuel Standards Rulemaking (173-424 WAC)

Dear Climate Fuel Pollution Reduction Staff:

SWTCH welcomes the opportunity to comment on Washington State Department of Ecology's Clean Fuels Standard Rule Development in response to a February 28, 2024 workshop and key questions posed to participants.

About SWTCH

SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across North America. Our end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH has deployed more than 10,000 chargers across North America, with a strong focus on equitable access. SWTCH's charging management platform is built to prevent stranded assets and to ensure future flexibility, scalability, and innovation.

Summary

- SWTCH opposes third-party verification for EV charging due to the cost burdens it places on Clean Fuels Standard credit claiming entities, stifling growth to meet existing and future EV charging needs in Washington.
- The Washington State Department of Ecology should maintain Part 4, Section 8(c)(viii) of the Clean Fuels Program (CFP) Rule.¹ This section exempts EV charging from reporting certain data in the Washington fuels reporting system (WFRS) in order to generate credits. This data is required in monitoring plans for other entities that are required to validate or verify under WAC 173-424-800.

Comments

SWTCH recognizes the importance of Clean Fuel Standards (CFS) to reduce greenhouse gas emissions from transportation fuels, improve air quality, and make low-carbon fuels more affordable and available. As Washington and other states CFS policies have demonstrated, these programs can decrease the carbon intensity of the state's transportation pool while delivering positive economic impacts thanks to improved health and reduced health care costs.²

¹ Washington State Department of Ecology. *Chapter 173-424 WAC Clean Fuels Program Rule*. Part 4, Section 8(c)(viii). 33. <https://app.leg.wa.gov/WAC/default.aspx?cite=173-424&full=true&pdf=true>

² BRG Energy and Climate. (2022, May 12). *Clean Fuel Cost Benefit Analysis Report*. Washington State Department of Ecology.

<https://ecology.wa.gov/getattachment/22790fe6-fc3a-414d-b3ba-036af0975258/20220512CfsCba.pdf>

SWTCH is a strong supporter of Washington's CFS program and has worked in Canada and California to help entities generate credits after installing EV charging stations. From this vantage, SWTCH has been exposed to the benefits and challenges of detailed monitoring plans and third-party CFS credit verification. In SWTCH's experience, third-party verification costs can range from \$10,000 - \$15,000. These additive costs can be especially challenging for multifamily and affordable housing entities interested in EV charging and CFS participation, as they may be constrained on budgets and resources to make EV charging projects pencil out.

Washington faces an EV charging deployment gap, so any potential deterrents to building out EV charging should be avoided. A Rocky Mountain Institute study determined that Washington will need to build approximately 1.3 million charging ports by 2030, increasing to 3 million by 2035.³ Washington currently has about 6,000 charging ports in public and private settings across all charger types.⁴ In order to meet the state's transportation electrification goals - including 100 percent new light-duty, zero emission vehicles by 2035 - it will need to avoid any unnecessary roadblocks to EV charging deployment. Detailed CFP monitoring plans and third-party credit verification increase costs to EV charging credit claiming entities. Instead, the Department of Ecology should maintain existing Clean Fuels Program Rules as they relate to monitoring plans and verification for EV charging.

In Closing

SWTCH appreciates the opportunity to offer comments on Washington's Clean Fuels Standard Rulemaking and share its perspective on EV charging and verification. SWTCH looks forward to staying engaged throughout the CFS Rule Development process.

If you have questions or if I can provide more information, please contact me at ben.brint@swtchenergy.com or 415.535.8444.

Respectfully,



Ben Brint
Policy Manager, Western U.S.

³ *Washington Transportation Electrification Strategy — Full Report*. (2024, February). WA.gov. https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Final_RMI-US-WA-Transportation-Electrification-Strategy_full-report_013124_710ce136-2862-4aca-a193-7aecf50f0d70.pdf

⁴ *Alternative Fuels Data Center: Electric Vehicle Charging Station Locations*. Alternative Fuels Data Center. https://afdc.energy.gov/fuels/electricity_locations.html#/analyze?country=US®ion=US-WA&fuel=ELEC&access=public&access=private