



March 4, 2024

WA Department of Ecology  
Clean Fuels Program

Re: Comments on proposed Clean Fuels Program (Ch. 173-424 WAC)

PineSpire appreciates the opportunity to comment on the Clean Fuels Program rulemaking. Based on the scope of the Rulemaking, as presented by Ecology, PineSpire recommends including the following topics in the rulemaking process:

#### Credit Generation for eTRUs

- We recommend designating the charger as the FSE for Transport Refrigeration Unit credits; this could be completed by updates to section 173-424-300 (g)(iii)(J).
- TRUs are more similar to vehicles than other material handling equipment in that they are mobile, are often charged at a variety of locations not owned by the TRU owner, and require an infrastructure investment to install a charger. This would still enable entities that do own their fleet at charge 'at-home' to generate their credits, while also encouraging broader infrastructure investment by logistics entities and improve the registration and reporting process for credit generation.
- For reference, this update would be consistent with changes proposed by California in their current LCFS rulemaking.

#### Data Publication

The quarterly data published by Ecology is significantly less robust than the data made publicly available in other low carbon fuel programs (such as Californias). This is a barrier to transparency and planning as a participant in the program.

Thank you for seeking and incorporating input from stakeholders in the CFP. We look forward to continuing the process and participating in the roll out of the program.

Sincerely

Ryan Huggins  
PineSpire