



Feb 28th, 2024

Mr. Adam Saul
Air Quality Planner / CFS Rule Lead
Washington Department of Ecology
adam.saul@ecy.wa.gov
360-742-7998

RE: Proposed Third-Party Verification

Dear Adam,

Smart Charging Technologies LLC (SCT) is an active player in the Washington Ecology CFS program as a program administrator and credit aggregator for many companies using electricity to power fleets of forklifts.

SCT is closely following the 2024 rulemaking process, especially the part related to third-party verification. SCT understands the drivers for such new rule, however we have the following reservations:

1. Recently imposed metering rules have significantly increased the financial burden on our clients operating electric fleets and led many of them to opt out.
2. Imposing a third-party verification will increase the financial burden as well.
3. Such financial burdens eat away the CFS incentives (Credits) our clients may get. Thus, leading our customers to question their involvement in the CFS program.

For all the above SCT advocates postponing the proposed verification to keep a low entry barrier in the first few years. This would increase the chances of keeping/making the program a viable option for existing and future clients, especially the small businesses. Thus help Ecology achieve the goals of the CFS program.

Respectfully,

maan altaher

Ma'n Altaher
Regulatory & Program Manager
Smart Charging Technologies LLC