

Ma'n Altaher

Greetings,

Please find our written comment attached.

Regards,

Ma'n



Feb 28<sup>th</sup>, 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