

December 13, 2024

Department of Ecology
State of Washington
P.O. Box 47600
Olympia, WA 98504-7600

Re: EV Realty informal comments on updates to the Clean Fuel Standard

Dear Mr. Saul and CFS and Climate Pollution Reduction Program Staff,

EV Realty appreciates the opportunity to comment on Washington's Clean Fuel Standard (CFS) rulemaking. The CFS is an important piece of Washington's policy portfolio as the state strives to meet goals for climate, clean air, and electrification. We have been very impressed with the process, attention to detail, and stakeholder engagement to date.

EV Realty develops, deploys, and owns multi-fleet EV charging hubs for commercial fleets. Our charging hubs provide critical charging solutions for fleets that may not be willing or able to deploy their own charging infrastructure due to grid constraints, landlord restrictions, resource limitations, or other operational considerations. We site charging in grid-optimized locations that mitigate the need for costly and time-consuming grid upgrades. Our overall mission supports Washington state policy priorities by accelerating electrification and reducing the overall costs associated with this transition.

Washington's CFS is an essential part of the state's portfolio of policies supporting emissions reductions in the transportation sector. When it comes to freight electrification, the creation of a heavy-duty "capacity credits" provision – heavy-duty Fast Charging Infrastructure (HD-FCI) – will be a very important driver for infrastructure deployment in the near term. **EV Realty strongly supports the creation of the HD-FCI provision** as a way to de-risk infrastructure investment accelerate truck electrification.

EV Realty applauds staff for recognizing the value of **shared, multi-fleet charging depots**, which are defined as charging sites "...available for use by at least two third-party heavy-duty EV fleets under different ownership and control. Site security controls are permitted provided there are no obstacles impeding authorized fleet vehicles from accessing the site, and any required registered equipment training must be accessible to users at no additional cost." We generally believe this definition is workable, with appropriate flexibilities on security and access controls as well as no-cost required training. The 10MW site cap is reasonable and the lack of overly prescriptive location requirements or other technical specifications will help encourage needed investment.

With regard to **payment methods**, we encourage staff to provide added flexibility for shared sites. The current language states: "The FSE that charges a fee for service must be capable of supporting a public point-of-sale method that accepts all major credit or debit cards." Shared, multi-fleet depot charging sites often have pre-negotiated contracts and seamless backend billing and payment systems rather



than point-of-sale credit card payment terminals. This can reduce costs (e.g., hardware, networking, and system integration) and improve the customer experience while eliminating a key failure point for charging. While point-of-sale systems are a good fit for fully public sites, they add unnecessary costs and complications to shared sites.

We are at a pivotal moment for heavy-duty fleet electrification. We greatly appreciate the leadership shown by Washington state policymakers who are working to put in place a suite of policies and incentives to support this transition. EV Realty looks forward to working with you and the broader stakeholder community to realize the benefits of this program.

Sincerely,

Jamie Hall
Director, Policy
EV Realty

