



Clean Fuels
ALLIANCE AMERICA

December 12, 2024

Mr. Adam Saul
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Comments on Rulemaking – Clean Fuel Standard Informal Comment Period #4

Submitted electronically: <https://aq.ecology.commentinput.com/?id=47sSbFWVp>

Mr. Saul,

The Clean Fuels Alliance America (Clean Fuels) appreciates the opportunity to provide written comments on the CFP 2024 Notice of Proposed Rulemaking. Clean Fuels is the U.S. trade association representing the entire supply chain for biodiesel, renewable diesel, sustainable aviation fuel, and Bioheat® fuel for thermal space heating. Our membership includes over 100 farmers, producers, marketers, distributors, and technology providers, and many are members of environmental organizations supportive of state and local initiatives to achieve a sustainable energy future.

Regarding the proposals contained in the current informal comment period, Clean Fuels appreciates the inclusion of “Alternative Marine Fuel” as a hard-to-decarbonize sector that needs additional incentives. The following are comments related to this:

- WAC 173-424-110(164) states that Alternative Marine Fuel” means a watercraft fuel made from liquified natural gas or nonpetroleum sources.” Is this intended to include both biodiesel and renewable diesel fuels? Please confirm or modify the definition to include them as they are both viable, cost-effective options to decarbonize the marine sector. If this definition is not intended to include renewable diesel, then Clean Fuels recommends that they be included, noting that producers of alternative jet fuel and alternative marine fuel also likely produce renewable diesel and that recordkeeping and reporting for only a portion of the fuels produced will be extremely difficult.
- WAC 173-424-420(11) states that “Producers of alternative jet fuel, sustainable aviation fuel, or alternative marine fuel may claim a utility-specific carbon intensity for electrolysis process energy through December 31, 2033.” Is this intended to mean that a pathway for AJF, SAF, or AMF could incorporate an emission factor for electricity other than the default regional eGRID factor? And specifically, that it could incorporate green hydrogen made via electrolysis using a utility-specific electricity carbon intensity value? Please confirm or clarify the intent.

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- WAC 173-424-420(11) refers to both alternative jet fuel and sustainable aviation fuel but I can't find a definition of sustainable aviation fuel. Please clarify.
- WAC 173-424-520 should include specific direction for alternative marine fuel that mirrors the requirement for alternative jet fuel.

Thank you again for the opportunity to submit written comments at this time. Please feel free to contact me at cwind@cleanfuels.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cory-Ann Wind". The signature is written in a cursive, flowing style.

Director of State Regulatory Affairs
Clean Fuels Alliance America