



Dec. 11<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 eTRU Registration**

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, eTRU, eCHE, etc...

Regarding proposed amendment 173-424-300(1)(h)(iii)(I) "Edited to require eTRUs to be registered by facility, rather than individually" and the Reason for Change: "...and aligns with LCFS update: 95483.2(b)(8)(B)(6) For electric forklifts, eCHE, or eOGV, or eTRU, FSE refers to the facility or location where electricity is dispensed for fueling."

Please note LCFS 95483(c)(4)(A) "For electricity supplied to Electric Forklifts, eTRU, eCHE, or eOGV, the owner of the FSE is the fuel reporting entity and the credit generator." On the other hand, WA CFS 173-424-220(7) "For electricity supplied to the eTRU, the eTRU fleet owner is the fuel reporting entity and the credit generator". Thus, the misalignment between LCFS and WA CFS.

To fully align with LCFS, WA CFS needs to assign (eForklifts, eTRUs, eCHEs, and eGSEs) credit generation to the facility's owner, not the fleet owner.

Keeping credit generation with the eTRUs fleet owner, as in the current proposal, while requiring eTRUs to be registered by facility just introduces unnecessary registration/reporting/contractual complications in case the facility owner and the eTRU owner are not the same entity.

For all the above, we kindly request that you consider assigning credit generation to the facility owner.

Respectfully,

*maan altaher*

Ma'n Altaher  
Director, Regulatory & Program Management  
Smart Charging Technologies LLC