

# MA'N ALTAHER

On behalf of Smart Charging Technologies:

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 credit generation to the facility's owner, not the fleet owner (eForklifts, eTRUs, eCHEs, and eGSEs).

In WA CFS changes, what is the purpose for changing the FSE to refer to the facility (not each eTRU), while keeping credit generation assigned to the fleet owner and not to the FSE(facility) owner? (other than partially aligning with LCFS)

To us, WA CFS needs to fully align with LCFS in regard to:

1. for eTRUS, FSE is the facility
2. Facility owner is the credit generator
3. eForklifts, eCHEs, and eGSEs need to have the same treatment

Best Regards,