



Clean Transportation
Technologies and Solutions

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October 3, 2024

Adam Saul, CFS Rule Lead
Department of Ecology
State of Washington
P.O. Box 47600
Olympia, WA 98504-7600

SUBJECT: Amendments to Chapter 173-424 WAC Clean Fuels Program Rule

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

CALSTART appreciates the opportunity to provide comments on the Clean Fuel Standard (CFS) rulemaking. The CFS has the potential to significantly reduce greenhouse gas emissions by decreasing carbon in the state's fuel pool and accelerating the deployment of zero-emission fuels and alternatives to petroleum fuel. The undersigned include a subset of CALSTART members that develop shared, multi-fleet EV charging hubs that provide third-party owned and operated charging to commercial EV fleet owners. This shared charging model will play a critical role in the transition of the transportation sector and provide important equity benefits by serving smaller sized fleets that may not have their own on-site charging or are unable to install charging due to limitations outside of their control (i.e. They rent their depot/parking space, and the property owner does not wish to invest in the needed infrastructure).

CALSTART and our Origins

CALSTART, headquartered in California, is a globally renowned 501(c)3 nonprofit organization dedicated to the advancement of zero-emission vehicle and infrastructure technology. With a global member consortium of more than 300 technology, government, industry, and community partners, CALSTART has worked for 30+ years to accelerate the commercialization and deployment of advanced technologies and solutions. While CALSTART is a membership organization, it is not a trade association and CALSTART members hold a range of views on these issues. Through policy development, incentive program administration, and first-of-its-kind deployment partnerships, CALSTART has designed and managed programs that drive the market for clean

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transportation technologies needed to achieve critical greenhouse gas and criteria pollutant emission reduction goals.

Comments on Amendments to Chapter 173-424 WAC Clean Fuels Program Rule

FCI Provisions and Shared Multi-Fleet Charging

CALSTART strongly supports staff's proposal to provide capacity credit opportunities for medium- and heavy-duty (MHD) infrastructure sites. Specifically, we appreciate staff's consideration of the shared charging business model, which will play a critical role in the transition of the transportation sector by providing greater certainty to fleet owners that a charger will be available for them on their route. Additionally, this shared multi-fleet model of charging will provide important equity benefits by serving smaller sized fleets that may not have their own on-site charging or are unable to install charging due to limitations outside of their control (i.e. They rent their depot/parking space, and the property owner does not wish to invest in the needed infrastructure). We greatly appreciate staff's inclusion of this business model, the expansion of the FCI program, and staff's receptiveness to our feedback during the informal workshop.

We would like to flag as a potential area of concern the bolded and underlined portion of the definition below:

"“Shared MHD-FCI charging site” means a non-public charging site for electric vehicles with a gross vehicle weight rating of 8,501 pounds or more that can be accessed by at least two MHD 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 no registered equipment training shall be required for individuals to use the site.**”

While we recognize the intent behind the required training language is to remove barriers to access, the industry has found that fleets and customers have expressed appreciation for these trainings. CALSTART encourages staff to engage with the shared charging industry in further discussion regarding the equipment training language highlighted above.

Conclusion

The CFS has tremendous potential to be an effective driver of carbon reductions in fuel while also incentivizing and promoting investments in zero-emission infrastructure necessary to support the transformation of the transportation sector. Thank you for your time and consideration. Please feel free to reach out if you have any comments or questions.

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