

3 October 2024

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

Re: Preliminary draft rule language for updates to the Clean Fuel Standard (Chapter 173-424 WAC)

Dear Adam Saul,

Climate Solutions thanks you for the opportunity to submit informal comments on updates to Chapter 173-424 WAC, the Clean Fuel Standard.

Climate Solutions strongly supported the passage of the Clean Fuel Standard (CFS), and we are excited to continue engagement in this rulemaking. We submitted more detailed comments on 7 June 2024. Many of these comments were either reflected in the preliminary draft rule language or pertained to topics for which preliminary language has not yet been released. To not be overly repetitive, we would like to simply convey:

- We are pleased to see shared MHD charging sites eligible for capacity crediting in the preliminary draft rule language.
- We are supportive of third-party verification requirements similar to those of Oregon and California. This would help ensure program integrity.
- We support Ecology's consideration of deliverability, additionality, temporal matching, and documentation in book-and-claim accounting and look forward to engaging more on the details when proposed draft rule language is released.

Thank you for your hard work. We are eager to continue working with the Department of Ecology on implementing and improving this program over time.

Sincerely,



Leah Missik
WA Deputy Policy Director

ClimateSolutions.org