

# Chris Leyerle

1. Please clarify the 6,000 credit limit proposed in WAC 173.424.820(2)(b)(ii)--includes non-metered residential? Time period? Only EV credits or all credits?
2. The additionality proposal is burdensome and duplicative. The CFS should be focused on reducing carbon in transportation; encouraging new renewable generation should be left to the CCA and/or CETA. Sourcing RECs for the CFS is already difficult enough with the overly-restrictive vintage requirements.
3. 3PV should be limited to Tier 2 pathways, or at least exclude lookup pathways and EV charging--how do we do site visits for hundreds of chargers every year?
4. If Ecology reserves the right to review and modify CI scores retroactively, and to claw back issued credits, it must provide detailed substantiation for the recalculation using the same GREET model originally used.

Thank you.