SRECTrade
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Submitted electronically at [Ecology Public Comment Forum]

July 29, 2025

Adam Saul
Environmental Planner
Washington Department of Ecology

Dear Mr. Saul,

SRECTrade respectfully submits the following comments to the Department of Ecology ("Ecology") in response to the draft Clean Fuels Program (CFP) proposed amendments in June 2025.

- **REC Book-and-Claim eligibility requirements**: By limiting the year of facility completion, Ecology is applying a standard to electricity that is not applied to other fuels, discounting the ongoing investment in operations required to produce renewable fuels, and negatively impacting the financial ecosystem required for developing new projects.
  - The proposed amendment imposes requirements for electricity crediting that are not applied to other types of credit generation, creating a bias in fuel sources.
  - The ongoing clean fuel production from a wind or solar facility is the result of continuing operation and maintenance investments that keep facilities generating. SRECTrade suggests that additionality is already achieved by limiting book-and-claim eligibility only to energy from recently produced vintages.
  - Revenue from sale of RECs is an expected component of the facility financial returns and is critical to attracting and retaining investment in renewable energy. A proven, ongoing, and reliable REC market directly influences the willingness of entities to invest in new clean energy facilities. Changing the eligibility requirements will undermine this market.
  - At a practical level, further limiting the eligible RECs will increase demand and consequently REC prices. At the same time, CFS credit prices remain stubbornly low and currently do not support book-and-claim participation in most cases – especially if eligible REC prices rise. This negative feedback loop could further reduce REC purchases, eliminating an important income stream for eligible renewable energy facilities.
- **Verification:** We support Ecology's proposed correction to include electricity as eligible for less intensive verification, particularly given the significantly lower complexity in electricity credit generation compared to other types of fuel production and credit generation.
- **Tier 2 EER Requirement**: The additional language proposed by Ecology for applicants for a new EER ("For electricity replacing other fuels, the letter must demonstrate using data that electricity is not the majority of the fuel currently used in the particular vehicle category") introduces unclear requirements and thresholds.
  - The requirement implies that CFP credit generation eligibility will be curtailed based on an adoption or utilization threshold. Such a significant policy decision for the CFP should be addressed directly and with more clarity, not through a relatively obscure addition to Tier 2 EER pathway requirements.
  - Unaligned Scope: Because only the applicant is eligible to generate credits under a Tier 2 EER, statewide adoption is not relevant. It is also not feasible for some applicants to collect and analyze that type of statewide market data. Ecology retains the role of determining appropriate statewide

utilization information, if applicable, if it were to add an EER to the regulation to make the vehicle category available to all CFS participants.

- The proposed language deviates from the Clean Fuel Standard's 'technology neutral' principles by singling out electricity. Could Ecology provide further clarifications as to why this requirement is only applied to electricity?
- Demonstrating the majority of fuel use across a vehicle category is a large and vague requirement. For example, what data sources, timeframes, market forecasts, and analysis methods would be considered acceptable to meet the demonstration requirement.

- **Clarification of FSE registration**: Please review and clarify this portion of the regulation, specifically the use of the term 'FSE' in the second sentence. For example, for registering an eTRU charging facility that has multiple eTRU chargers and meters, would the facility, the charger, or the meter be registered as the FSE? "For electric forklifts, eCHE, eOGV, eTRU, or eGSE, FSE refers to the facility or location where electricity is dispensed for fueling. If there are multiple FSEs capable of measuring the electricity dispensed at the facility or location, then an entity may provide the serial number assigned to each individual FSE by the OEM, along with the name of the OEM."

Thank you very much for your time and consideration as you review these comments.

Ryan Huggins
SRECTrade, Inc.

SRECTrade provides management and transaction solutions for renewable energy and clean fuel programs across North America, helping the nation's leading EV charging networks, EV fleet operators, and others participate in and benefit from complex compliance markets. SRECTrade is the largest aggregator of EV charging stations under the California Low Carbon Fuel Standard (LCFS) and the Washington Clean Fuel Standard.