

August, 1 2025

Mr. Adam Saul
Department of Ecology
PO Box 47600,
Olympia, WA 98504-7600

RE: Clean Fuel Standard (Chapter 173-424 WAC) Rulemaking Proposal

We are a broad coalition of leaders in the medium- and heavy- duty zero-emission transportation sector. We appreciate the opportunity to provide comments on the proposed changes to Washington's Clean Fuel Standard (CFS). The CFS program is crucial to close the cost gap between ZEVs and ICEVs. These proposed changes, particularly the HD-FCI program, will drive the deployment of infrastructure and affordable charging for commercial fleets in Washington.

Many electric truck and bus stakeholders view Washington as an important early market. In WA state, as of 2024, 1,984 MHD ZEV vehicles were deployed¹ and this number is increasing. Several medium and heavy-duty projects are already underway in the state, and we would expect this to pick up as the state takes additional steps to support the market.²

Some of the signatories operate shared charging depots that serve a public good by meeting fleets' needs with guaranteed, reliable access to charging. Additionally, the high utilization at these sites maximizes the return on public and private investment and drives air quality improvements associated with an increased adoption of ZEVs³.

We appreciate WA Department of Ecology's creation of the HD-FCI program and inclusion of shared charging under this definition: "site will be available on a continual basis to at least two third-party heavy-duty EV fleets under separate ownership and control." The increased location flexibility and allowance of land costs are improvements to the proposed HD-FCI program. We think that a per-site cap of 10MW is appropriate but suggest that the credit life under HD-FCI is increased to 10 years.

Given complex market headwinds we recommend alleviating some of the cost burdens and complexities brought on by third party verification as it is currently proposed. To reduce barriers for charging providers WA Department of Ecology should delay the start date for verification of annual reports and quarterly reports, raising the threshold for deferred verification from 6,000 annual credits to 10,000 annual credits, and allow virtual visits in lieu of site visits to the central data location for this fuel pathway.

While outside of the scope of this rulemaking, we look forward to accelerated carbon intensity targets in accordance with HB 1409 which will drive increased credit generation and revenue for

¹ <https://calstart.org/zio-zets/#zet-dashboard>

² For example, among the signatories of this letter, [Zeem Solutions is building a shared charging depot in SeaTac](#) where the initial phase will serve at least six local fleet operators and Highland Electric Fleets is deploying a 16 electric school bus project with Woodland Public School District.

³ <https://calstart.org/shared-charging/>

the ZEV industry. By improving economics at these charging sites, investors gain confidence and private capital is unlocked to build more facilities.

The ZEV industry is at a critical inflection point: technology is maturing but federal support is wavering. It is important now more than ever for states to show leadership as the Department of Ecology has in supporting this transition.

Sincerely,

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