November 5, 2025

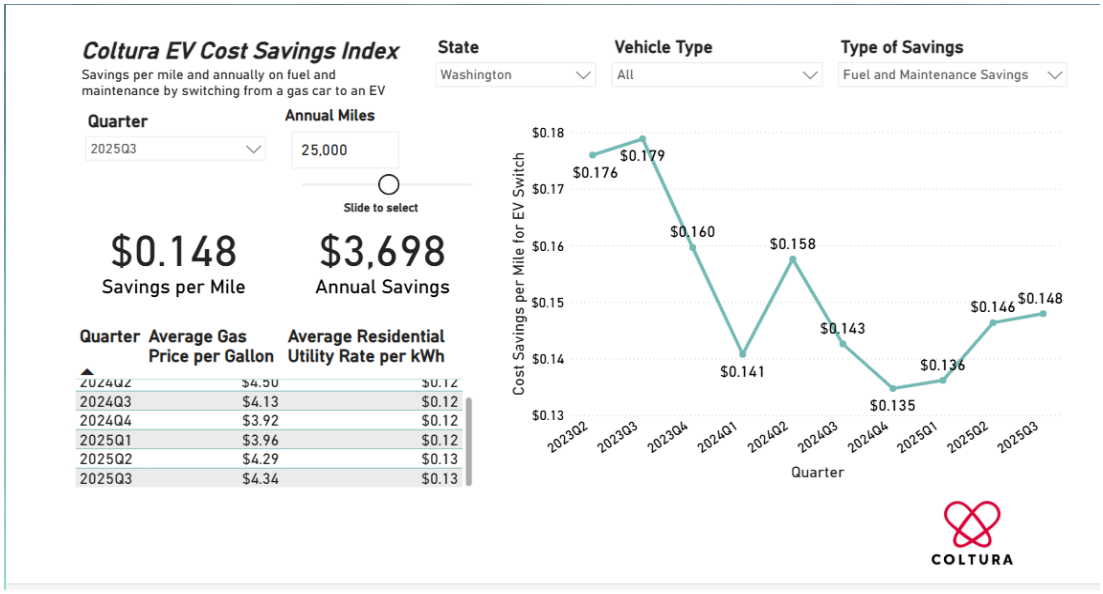
TO: Department of Ecology
FR: Rob Sargent, Coltura
RE: ZEVERGREEN Dialogue Comments

Thank you for the opportunity to provide input on Washington's EV programs. We commend Governor Ferguson's leadership on vehicle electrification and look forward to helping the state remain at the forefront of EV deployment.

With Federal EV incentive programs gone, and state authority to adopt more stringent emission standards on the ropes, we need fresh approaches to advance EV adoption. EV programs can and must deliver greater gasoline displacement, household savings, and avoided pollution per dollar spent.

The solution: focus outreach and spending on high-gasoline users who will see the greatest fuel savings.

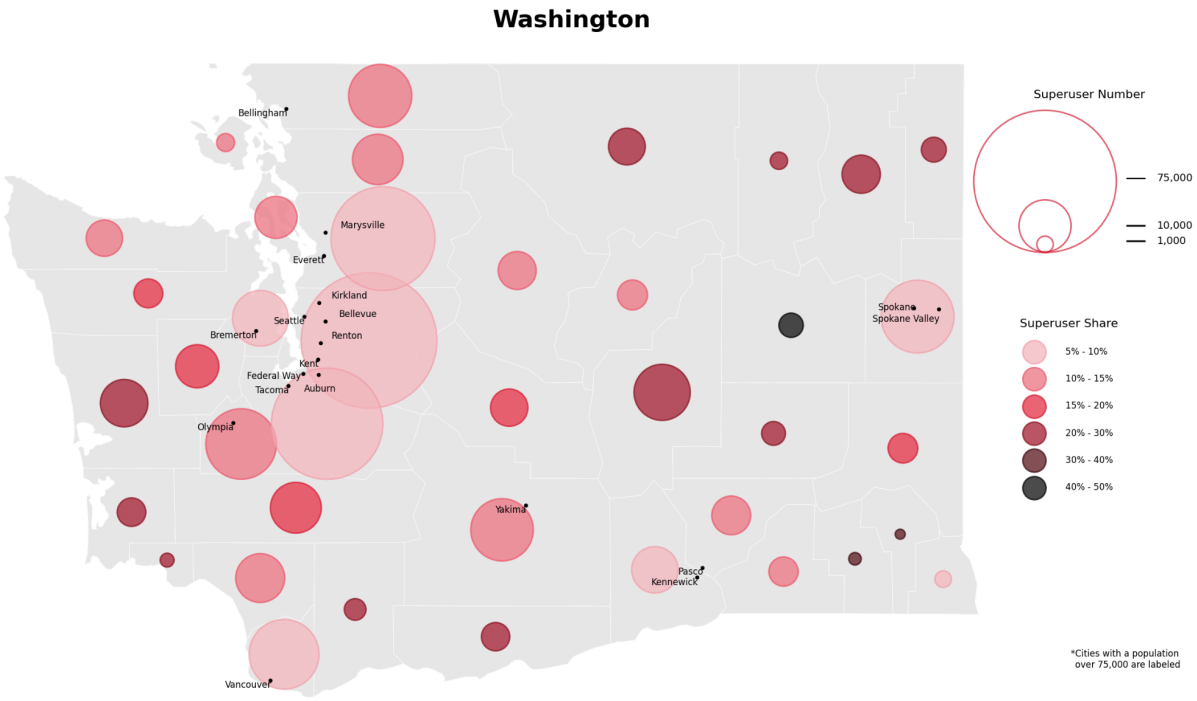
1. Lean into the Inherent Financial Savings on Fuel and Maintenance - With low electricity rates and higher prices for gasoline, Washington ranks #1 in the nation on the potential for EVs to provide financial relief, with EV fuel and maintenance savings of nearly 15 cents/mile. The more someone drives, the more they'll save by switching to an EV. Someone driving 10,000 miles a year saves nearly $1,500/year in fuel and maintenance; someone driving 25,000 miles/year can save $3,700/year (see chart below). The people who drive the most not only save the most, but also they displace the most gasoline by switching to an EV.



Washington should help drivers calculate their individual savings potential and streamline their path to EV ownership. Helping Washington drivers understand their personal EV savings will require allocating substantial resources to outreach.

2. Use Data to Guide Outreach and Incentive Programs - State EV education and incentive programs are designed for broad eligibility with minimal targeting. That approach made sense in the early phases of EV adoption, but not now when demand for EV incentives far exceeds supply. Now, states must ground their programs in hard data and target drivers for whom the transition to EVs will be most impactful.

As Coltura's tools demonstrate, it's possible to identify and target the people for whom an EV will bring the greatest financial relief. The map below shows the number and concentration of gasoline superusers (drivers in the top 10% of in terms of gasoline use) in Washington by county.



State EV outreach and incentive programs should devote a much higher percentage of their budgets to targeted marketing, and prioritize households for whom fuel savings will be transformative. Rather than offering a flat incentive to all persons below an income threshold, programs should steer support to the lower-income drivers who use the most gasoline. This will maximize gasoline reduction per dollar spent, provide more meaningful financial benefits, and cut emissions more than an undifferentiated approach.

3. Measure What Matters and Adapt Based on Results - EV programs should maximize gasoline displacement per dollar spent while helping those who need it most. But most programs define success by rebates distributed, and ascribe carbon benefits based on the average gasoline use of the state's drivers, missing opportunities to optimize performance. We recommend tracking these key metrics based on actual program recipients and adjust in real-time:

- Gallons of gasoline displaced
- Annual fuel savings per participant
- Cost per gallon of gasoline displaced
- Equity outcomes (income, location, vehicle replaced)

We recommend that programs use those metrics to be more flexible, using these adaptive management strategies:

- Release funds in tranches rather than all at once
- Adjust incentive amounts if funds are depleting too quickly
- Redirect marketing if rebates aren't reaching high-gasoline users
- Modify eligibility based on early results

While, by many measures, Washington's most recent rebate program succeeded, it also illustrates the risk of inflexible design.The state's $45 million program launched in August 2024 but ran out of money in less than three months – before any adaptation could occur. It did not measure gasoline displacement nor effectively target lower-income zip codes. Most of the money was expended in $9,000 incentives for three-year leases, providing only short-term benefits for those households.

Building in flexibility and learning can deliver far better results than those that simply distribute funds until they're gone.

4. Explore Additional Ways to Help With Upfront EV Costs - In addition to optimizing how subsidies are distributed, states and utilities should explore new ways to help with upfront costs.

One promising model is offering down payment assistance in exchange for a share of the driver's future fuel savings, similar to on-bill financing used for energy efficiency upgrades.

Under this model, an EV buyer might receive $3,000 advance toward a down payment, with a portion of their monthly fuel savings (which can exceed $200 for high-mileage drivers) allocated to repayment and added to their electric bill. This reduces the need for large grants, avoids burdening the buyer with new debt, and aligns repayment with actual savings. With thoughtful design, this approach can dramatically increase the reach of limited public funds while supporting lower-income, higher-gasoline drivers.

5. Lead by Example - Continue to implement the state's plan for electrification of the state vehicle fleet ; consistent with Executive Order 21-04 State procurement can show the way while saving taxpayer's money.

6. Aim High -Last, but not least, Washington must continue to aim high with ambitious targets and an all-of-government approach to vehicle electrification. an all-of -government approach to vehicle electrification.

Conclusion: As federal dollars dry up, we can't afford business as usual. We need smarter EV outreach and incentive programs, not just bigger ones. By aiming high, focusing on fuel savings, measuring the outcomes that matter, and leveraging gasoline displacement as a financing tool, Washington can stretch its dollars further and build lasting momentum.