



February 25, 2026

Clean Fuel Standard Regulation
Washington State Department of Ecology

Re: Comments on Rulemaking for Clean Fuels Standard (WAC 173-424 and 173-455-150)

Dear Dept. of Ecology,

SRECTrade, Inc. (dba Xpansiv Managed Solutions) respectfully **recommends that Ecology prioritize developing a Tier 1 Hydrogen calculator as soon as feasible, given the hydrogen lookup pathways are no longer available per recent amendments to the CFS.** Completing this calculator will align with Ecology's stated goal in this rulemaking process to "improve implementation of the rule" as well as "aligning with other low carbon fuel programs".

CARB's Tier 1 hydrogen calculator (which has been available for several years) provides an available basis for completing Ecology's calculator. The grid-CI score in CARB's tool can be replaced with a reference value of the utility CI score, which Ecology is already publishing annually, to make the calculator Washington-specific and more accurate representation of GHG emissions. Completing a Tier 2 pathway may be time and cost prohibitive for nascent hydrogen projects, and may not provide a significantly more accurate CI score than a utility-specific electrolysis Tier 1 calculation. The inclusion of HD-HRI capacity crediting in the program indicates the importance of supporting hydrogen infrastructure as a heavy-duty vehicle fueling solution in Washington; making a Tier 1 pathway available and attainable will align with this priority.

We applaud the Washington legislature's actions to strengthen the ambition of the program and viability of the CFS market by implementing stricter CI standards. Additionally, Ecology's work to ensure the GREET model reflects Washington's specific fuel supply parameters remains important to ensure integrity of the greenhouse gas reductions credited in the program. These steps, along with facilitating Tier 1 hydrogen participation, send strong signals of support for ongoing transportation decarbonization in the state.

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

Ryan Huggins
Director, Business Development
Xpansiv Managed Solutions



About Xpansiv Managed Solutions

Xpansiv Managed Solutions (formerly SRECTrade) is one of the largest managers of environmental commodity programs in the United States. By simplifying participation in complex regulatory programs for homeowners, businesses, and installers, we make it easy for them to benefit from environmental markets, while accelerating the deployment of clean energy and clean transportation assets. With roughly 2 GW of renewable energy assets on our platform and over \$1 billion distributed to customers and partners, Xpansiv Managed Solutions is renowned for our market expertise, broad geographic coverage, and superior customer service.

Xpansiv is the leading infrastructure provider for the energy transition markets. The company's comprehensive platform includes registries, online marketplaces, market execution services, wholesale power solutions, and market data for energy and environmental commodity markets. Xpansiv provides solutions that enable stakeholders to deliver transparent, credible, and auditable environmental claims to address the growing global demand for assurance and accountability on climate action and sustainability performance. We are trusted by over 125,000 customers and partners, from Fortune 500 companies and government agencies to project developers and homeowners.