Date: March 3, 2026

Washington State Department of Ecology
Attn: Clean Fuel Standard Rulemaking Team
P.O. Box 47600
Olympia, WA 98504-7600

Submitted via: https://ecology.wa.gov/commentinput

Re: Comments on Proposed Amendments to Chapter 173-424 WAC – Clean Fuel Standard Rulemaking (Fast Charging Infrastructure Credits)

Dear Department of Ecology Clean Fuel Standard Rulemaking Staff,

Thank you for the opportunity to provide comments on the Department of Ecology's proposed amendments to Chapter 173-424 WAC governing Washington's Clean Fuel Standard. Washington's Clean Fuel Standard is an important and effective policy tool for reducing greenhouse gas emissions from the transportation sector while encouraging investment in the infrastructure needed to support a transition to zero-emission transportation.

We appreciate Ecology's efforts to strengthen the program and to increase alignment between Washington's Clean Fuel Standard and similar programs in neighboring jurisdictions. In that context, we respectfully recommend that Ecology revise the Fast Charging Infrastructure provisions of the rule to explicitly allow private fast-charging infrastructure to generate credits, including Heavy-Duty Fast Charging Infrastructure (HD-FCI) and Light- and Medium-Duty Fast Charging Infrastructure (LMD-FCI) located at private fleet facilities.

Allowing private fast-charging installations to qualify for infrastructure credits would better harmonize Washington's program with California's Low Carbon Fuel Standard, which has demonstrated the significant benefits of recognizing both public and private charging infrastructure deployments. Under California's LCFS framework, FCI credits have played an important role in accelerating the deployment of electric vehicle charging infrastructure by helping offset the substantial capital costs associated with high-power charging systems.

These investments are particularly important for medium- and heavy-duty vehicle electrification. Commercial fleet operators typically rely on depot-based charging infrastructure located at private facilities rather than publicly accessible charging stations. Freight operators, delivery fleets, transit agencies, school bus fleets, and municipal vehicle operators frequently deploy charging infrastructure at logistics centers, fleet yards, and maintenance depots where vehicles return on a regular schedule. These private installations are often essential for reliable fleet operations and represent a significant portion of the infrastructure required to electrify the transportation sector.

The capital cost of installing high-power DC fast charging infrastructure can be substantial. Individual charging ports for commercial vehicles can cost hundreds of thousands of dollars once equipment, installation, and grid interconnection costs are considered. Larger fleet depots may require multiple high-power charging units along with distribution system upgrades and other site improvements that significantly increase total project costs. In this context, infrastructure credits serve as an important financial mechanism that helps improve project economics and enables charging developers and fleet operators to make the necessary investments.

California's experience demonstrates that including private charging infrastructure within the FCI crediting framework can meaningfully accelerate infrastructure deployment. Many fleets operate on predictable schedules and charge at centralized facilities, allowing depot charging infrastructure to achieve relatively high utilization rates compared with some publicly accessible chargers. This can improve system efficiency while ensuring that the infrastructure needed to support fleet electrification is deployed where it is most operationally effective.

The electrification of medium- and heavy-duty vehicles represents one of the largest opportunities to reduce transportation emissions. These vehicles account for a disproportionate share of transportation sector greenhouse gas emissions, yet their electrification depends heavily on the availability of reliable high-power charging infrastructure. Because heavy-duty charging installations are frequently located at private depots rather than public locations, excluding these installations from FCI credit eligibility may inadvertently slow the deployment of infrastructure necessary to support freight and commercial fleet electrification.

Allowing HD-FCI and LMD-FCI credits for private charging infrastructure would strengthen the Clean Fuel Standard's ability to support this transition. It would also improve regulatory consistency across West Coast clean fuel programs. Many fleet operators and infrastructure developers operate across multiple states, and aligning Washington's program with California's LCFS framework would help reduce administrative complexity and encourage investment in charging infrastructure throughout the region.

For these reasons, we respectfully recommend that Ecology revise the proposed rule language to explicitly allow privately owned and operated charging infrastructure to qualify for Fast Charging Infrastructure credits, including installations serving heavy-duty, medium-duty, and light-duty vehicle fleets located at private facilities. Such revisions would ensure that Washington's Clean Fuel Standard fully supports the infrastructure investments required to accelerate transportation electrification and reduce emissions across the state.

Sincerely,

Todd Trauman
CEO
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