

May 4, 2026

To the Washington State Department of Ecology:

**RE: Cap-and-Invest: Draft Washington-California-Québec linkage agreement**

PetroCard appreciates the opportunity to provide comments on the proposed linkage of Washington's cap-and-invest program with the California-Québec market.

As a fuel distributor operating in Washington, we are generally supportive of linkage, particularly because of the role it can play in improving market stability. Washington's standalone program has experienced periods of price volatility that create uncertainty for regulated entities. This uncertainty makes it more difficult to plan, manage compliance costs, and provide consistent pricing to customers.

Linkage with a larger, more established market would increase liquidity and help moderate price fluctuations over time. A more stable and predictable allowance market enables businesses like ours to make better operational and investment decisions, while also reducing the risk of sudden cost increases that are ultimately passed through to consumers.

In addition, a linked market can improve overall market efficiency by broadening the pool of participants and compliance options. This can help ensure that emissions reductions are achieved at lower overall cost, while still supporting the state's climate goals.

While we support linkage, we encourage Ecology to monitor market outcomes post-linkage and to report publicly on cost containment, environmental integrity, and equitable outcomes for Washington communities.

Thank you for the opportunity to comment on this important decision.

Sincerely,

*Glenn T. Thomas*

Glenn T. Thomas

Director, Supply & Distribution

PetroCard