

June 17, 2026

Lauren Sanner, CFS Rule Lead
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504

RE: 3Degrees comments in Response to Energy Economy Ratio (EER) and Transportation Electrification Workshop

Dear Lauren Sanner and CFS Team,

3Degrees Group, Inc. (3Degrees) appreciates this opportunity to submit comments to the Department of Ecology (Ecology) on the recently previewed proposals for the CFS rule.

3Degrees is a global climate and clean energy solutions provider and is a strong supporter of the CFS program. We participate in the program as a designated reporting entity on behalf of a variety of opt-in parties with light-duty electric vehicle chargers, electric forklifts, hydrogen forklifts, and heavy-duty EV fleets. We are also an active fuel pathway developer.

We offer the following comments in response to the Workshop held May 27, 2026.

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Switching to an updated Washington-based methodology for EER calculation is credible and supports credit generation at a crucial juncture.

3Degrees is supportive of Ecology's proposed updates to the methodology for calculating the Energy Economy Ratio (EER) for Light Duty Vehicles. Updating this calculation reflects the significant changes to both electric/hybrid (EV/PHEV) vehicles and ICE vehicle engines in the 15 years since CARB originally derived the previous EER values. We are also supportive of using Washington-specific vehicle registrations to more accurately capture how the program is impacting the fuel and vehicles on the road in Washington.

The methodology proposed for joining the WA DOL and EPA datasets is sound. Although the EPA dataset only derives MPGe from specific idealized driving conditions, this limitation is shared for both EV/PHEV and ICEV sides of the equation and therefore should not be a material limitation.

3Degrees also recognizes that the updated methodology will result in higher credit generation for light duty EVs, which is crucial at a time in which federal incentives have been lost and the adoption of EVs/PHEVs has become more tenuous. The CFP is an essential tool to maintain progress towards transportation electrification in Washington, and this update will set an example for other states.



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3Degrees appreciates this opportunity to provide feedback and we look forward to continuing to work with Ecology throughout the rest of the rulemaking process. Please reach out with any questions or for further discussion.

Sincerely,

/s/ Theresa Keith

Theresa Keith
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