



June 17, 2026

Lauren Senner
Washington State Department of Ecology
Climate Pollution Reduction Program
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Senner,

On behalf of Seattle City Light, I am writing to provide public comment regarding Ecology's May 27 rulemaking workshop for the Clean Fuel Standard (CFS).

Consistent with our mission as a municipal, community owned utility, all CFS credit proceeds will be reinvested to support transportation electrification, reduce greenhouse gas emissions and air pollution, and advance equitable access to transportation electrification. These investments, approved by the Seattle City Council in 2025, are guided by City Light's [Transportation Electrification Strategic Investment Plan \(TESIP\)](#), which identifies the priority strategies and programs that will shape our transportation electrification work through 2030.

City Light intends to direct CFS credit revenue toward the following strategies, outlined in TESIP:

- **Grid modernization** – investing in distribution system upgrades, grid analytics, and load management tools necessary to support increasing electric vehicle adoption. These investments ensure that the utility can reliably serve new transportation loads while maintaining safe, affordable service for all customers.
- **Public charging infrastructure** – supporting the deployment of public fast charging and neighborhood-scale charging. Priority will be given to locations that address service gaps and support mode shift.
- **Customer incentive programs** – using CFS funds will allow City Light to standardize and expand charging infrastructure incentives and technical assistance for residents, businesses, fleets, and more. These offerings will help reduce adoption barriers, lower total cost of ownership, and accelerate the transition to electric vehicles across diverse customer groups.
- **Equity-centered mobility investments** – consistent with TESIP, City Light will prioritize investments that reduce transportation burdens in frontline and overburdened communities. This includes supporting community-developed mobility and electrification projects, improving access to charging in multifamily and mixed-use buildings, and developing programs that directly benefit households facing the highest economic and environmental burdens.
- **Transit, freight, and maritime electrification** – in partnership with local agencies, port authorities, and private operators, CFS revenue will support electrification of high-impact

transportation sectors such as transit buses, medium- and heavy-duty freight, and shore power connections. These investments deliver substantial emission reductions and improve air quality in communities most affected by transportation pollution.

We will continue our transportation electrification initiatives and increase investment through CFS credit revenue in 2027. City Light has proposed a \$10 million budget request in 2027 to support our electrification efforts. Our investments will continue to support TESIP priorities while we design new projects to align with Ecology's CFS Guidance on Residential EV Charging Credit Revenue Requirements.

We appreciate Ecology's leadership in implementing the Clean Fuel Standard and look forward to continued collaboration in advancing Washington towards a cleaner, more equitable transportation system.

Sincerely,

Landon Bosisio
Transportation Electrification Advisor
Seattle City Light