June 12, 2026

Clean Fuel Standard Regulation
Washington State Department of Ecology

Re: Public Comment on Rulemaking for Clean Fuels Standard (WAC 173-424 and 173-455-150) - Energy Economy Ratio (EER) Updates

Dear Department of Ecology Staff,

SRECTrade, Inc. (dba Xpansiv Managed Solutions) appreciates the opportunity to provide comments on the Department's ongoing rulemaking to amend the Clean Fuel Standard (Chapter 173-424 WAC), including proposed updates to Energy Economy Ratios (EERs) for electricity used as a transportation fuel.

As a leading market participant supporting credit generation, tracking, and monetization across low carbon fuel programs, Xpansiv strongly supports Ecology's efforts to strengthen the Clean Fuel Standard (CFS) and maximize its ability to accelerate transportation electrification in Washington.

Support for Updating Light-Duty EV EER Values

Xpansiv strongly supports Ecology's proposal to update the EER for light-duty electric vehicles to reflect current vehicle performance data and real-world fleet composition.

As presented during the May 27, 2026, workshop, the current EER value of approximately 3.4 is based on outdated assumptions, while updated analysis suggests an average value closer to ~4.2 based on Washington-specific fleet data.

Xpansiv supports Ecology's proposed data-driven methodology, including the use of Washington vehicle registration data paired with EPA fuel economy datasets, as a transparent and defensible approach.

Alignment with Established North American Regulatory Benchmarks

In addition to reflecting Washington-specific data, increasing the EER is consistent with established regulatory benchmarks across North America, further strengthening the justification for this amendment.

Notably, under Canada's Clean Fuel Regulations (CFR) and related modeling frameworks, light-duty electric vehicles are commonly assigned an EER value of approximately 4.1, reflecting updated vehicle efficiency and fleet characteristics.

This 4.1 value is supported by Canadian market analysis demonstrating that earlier EER assumptions (e.g., ~3.4) significantly understate the relative efficiency of electric vehicles compared to gasoline vehicles.

Aligning Washington's updated EER value with this range would:

- Promote consistency across leading North American clean fuel programs.
- Provide regulatory certainty for multi-jurisdictional market participants.
- Ensure Washington remains competitive in attracting electrification investment and infrastructure development.

Importance of Strengthened Credit Signals for Electrification

Increasing the EER for light-duty EVs will directly increase credit generation for electricity, strengthening the financial incentives that underpin transportation electrification deployment.

This is particularly important given the rulemaking's stated objective to **maximize the Clean Fuel Standard's ability to support transportation electrification**, especially in the context of evolving or reduced federal support.

Stronger electricity credit generation will:

- Support continued investment in EV charging infrastructure.
- Enable scaling of utility and private-sector electrification programs.
- Enhance the economic viability of residential and fleet charging pathways.
- Help Washington meet its more ambitious carbon intensity reduction targets under HB 1409

From a market perspective, accurately valuing electricity through an updated EER is essential to maintaining a balanced and technology-neutral credit framework, ensuring electrification pathways compete fairly with other low-carbon fuels.

Conclusion

Xpansiv commends the Department of Ecology for its leadership in advancing a robust and adaptive Clean Fuel Standard. Updating the EER for light-duty EVs is a critical step to ensure the program accurately reflects current technology, maintains strong investment signals, and continues to drive meaningful emissions reductions.

Grounding this update in both Washington-specific data and established benchmarks such as Canada's CFR (~4.1 EER) provides a strong, defensible foundation for the rulemaking. Xpansiv respectfully urges Ecology to move forward with increasing the light-duty EV EER within this range and to establish a framework for ongoing updates.

We appreciate the opportunity to engage in this process and welcome continued collaboration.

Sincerely,

Becca Teigen
Director, Clean Transportation
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 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.