

July 31, 2026

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

RE: 3Degrees comments in Response to Fees and Credit Monetization 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 July 15, 2026.

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3Degrees recommends differentiating lookup table pathways from other pathways when assessing program fees.

3Degrees understands Ecology's need to establish reasonable fees that reflect the level of staff time required to administer the CFS program, including review of fuel pathways. We recommend that the rule distinguish between custom fuel pathway applications and the lookup table pathways that Ecology must maintain for all participants. Given their broad utility, the costs associated with developing and maintaining lookup tables are better aligned with general program participation fees, such as opt-in entity and aggregator fees, rather than per-pathway application fees. Treating lookup table pathways in the same manner as bespoke pathway applications could inadvertently disincentivize their use, even though lookup tables can lower administrative burden by providing standardized values. 3Degrees therefore recommends clarifying that proposed pathway fees would not apply to lookup table pathways.

3Degrees supports sending invoices to aggregators and recommends itemizing fees by designator.

3Degrees is supportive of the proposed procedural updates under which Ecology would send invoices directly to aggregators for fees associated with opt-in entities that have designated an aggregator as their reporting party. This aligns well with existing market practice and contract structures, where aggregators already manage CFS participation and crediting on behalf of designators. It also keeps program communication and billing more streamlined by centralizing the information flow.

3Degrees recommends that the updated billing structure be designed in a way that ensures transparency and facilitates subsequent communication between aggregators and designators. For example, the invoice issued to the aggregator could be itemized by designator and fee type, showing the fee attributable to each designator. Itemized formatting would allow aggregators to share relevant details with each individual designator without exposing confidential information about other program participants. Such a structure will support clarity for program participants, align with prevailing commercial practice, and reduce administrative burden for Ecology and aggregators.

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

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