July 29, 2026

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Washington State Department of Ecology
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Re: Chapter 173-424 WAC and WAC 173-455-150, Clean Fuels Standard Rulemaking Informal Comment Period for Transportation Electrification

Spokane Transit Authority (STA) appreciates the opportunity to provide comments on the proposed Clean Fuel Standard rulemaking. STA is the regional public transportation provider serving approximately 248 square miles throughout Spokane County, providing fixed-route, paratransit, and on-demand transportation services to a population of more than 430,000 residents. Each year, STA provides over 10 million passenger trips, connecting people to employment, education, healthcare, and essential services while supporting the region's economic vitality. As part of its long-term commitment to sustainability and responsible stewardship of public resources, STA has become a national leader in the deployment and operation of battery-electric transit buses. Through Washington's Clean Fuel Standard program, STA has leveraged Clean Fuel Standard credits to help offset the costs of fleet electrification, charging infrastructure, and zero-emission fleet operations. STA also partners with Avista Utilities to expand transportation electrification by hosting publicly accessible DC fast charging and Level 2 charging stations at four STA park-and-ride facilities. STA also supports Avista's Make Ready Program to support future fleet charging infrastructure, recognizing the value of utility investment in exchange for the assignment of Clean Fuel Standard credits generated by those charging assets. STA believes the Clean Fuel Standard is a critical tool for encouraging collaboration between utilities and fleets while helping reduce the cost of transportation electrification across Washington.

STA would specifically recommend three considerations that will result in more credits to fleets, make large scale expansion of heavy-duty charging stations attractive, and lower compliance costs for fleets.

1. **Capacity credits for heavy-duty EVs at fleet's own sites:** In addition to the existing Advanced Credits, Ecology should add capacity credits for heavy-duty fleets (HD FCI)- both private and public fleets- to the CFS and use the California LCFS formula, which appropriately provides a smaller credit than Washington's current capacity credit (HD-FCI) for charging at shared depots and truck stops. The logic for this is Ecology's stated objective that they have statutory requirement to "harmonize" the CFS with other clean fuels jurisdictions. We agree with Tesla's point in the workshop regarding the benefit of capacity credits to an individual fleet: It's much more cost effective for a fleet to go big and install all the needed DCFC all at once, rather than a slow incremental process over many years.

Regarding using only advanced credits (and no capacity credits) to stimulate public fleet adoption of heavy duty EVs, we would like Ecology to provide a more detailed comparison with the above option, before we take a position. Even if the Advanced Credit system is reformed to allow more fleets, we are not sure if that will make a significant difference given the cap (5% of deficits), compared to our recommendation above.

2. **Verification of compliance:** The new CFS has extensive requirements for fleets and others to pay third-party verifiers annually to verify compliance with CFS. Ecology should align with California's LCFS and allow more time to encourage transportation electrification prior to the start of verification. One way that California did this was by starting verification for non-electric fuels in 2019 but waiting until now to begin verification of TE. Similarly, Ecology should delay verification of TE credit generation until 2032 (rather than starting in 2028 for 2027 data). The logic for this is Ecology's stated objective that they have statutory requirement to "harmonize" the CFS with other clean fuels jurisdictions.

3. **Continue supporting utility-led transportation electrification:** STA encourages Ecology to maintain policies that support utility investment in transportation electrification through the Clean Fuel Standard. Utility programs have helped expand public charging infrastructure and reduce barriers to fleet electrification, including through partnerships such as Avista's publicly accessible charging sites at STA park-and-ride facilities and fleet make-ready incentives. Continued support for these programs will help accelerate transportation electrification while benefiting fleets, businesses, and the traveling public.

Further, to lower administrative costs and stimulate TE adoption, Ecology should require virtual site visits every three years for verification of TE after the first site visit, and train verifiers in the meter accuracy regulations of utilities and the Division of Weights and Measure in the Department of Agriculture in order to avoid double regulation of meter accuracy.

Respectfully,

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