

September 30, 2026

Attn: Lauren Sanner
Climate Pollution Reduction Program
Department of Ecology
PO Box 47709
Olympia, WA 98504-7709

RE: RHA Comments on CI Reduction Schedule

Dear Ms. Sanner:

The Renewable Hydrogen Alliance (RHA) appreciates the opportunity to comment on the Department of Ecology's (the Department) Carbon Intensity (CI) Reduction Schedule scenarios in advance of the upcoming Clean Fuels Standard rulemaking. RHA is a regional non-profit trade association with members across the full value chain of the hydrogen ecosystem, working to enable access to safe, affordable, and renewable hydrogen for communities across the Pacific Northwest.

RHA provides the following responses to the questions the Department posed in its discussion paper:

1. Which scenario do you prefer: A, B, or C? Why?

RHA prefers Scenario A, the least gradual scenario. While all three scenarios are quite similar and lead to the same long-term greenhouse gas (GHG) reductions, Scenario A would create the most demand for clean fuels in the near term, leading to higher credit prices and greater market support for established and emerging clean fuels.

Renewable and clean hydrogen are expected to play a critical role in the supply of clean fuels across the economy, not only as fuel for hydrogen fuel cell vehicles, but also as an essential input for the production of clean derivative fuels, including renewable diesel, alternative jet fuel, methanol, and ammonia. Increased demand for clean hydrogen and its derivatives would provide the positive market signals necessary for continued investment in this sector.

2. Do you prefer a more gradual schedule or a less gradual schedule? Why?

RHA prefers a less gradual CI reduction schedule as the timing of GHG emissions reductions is just as critical the volume of reductions.

3. Are there alternative scenarios you would like Ecology to consider?

No. The scenarios the Department provided are clear and easy to understand.

In closing, RHA thanks the Department for its continued stewardship of the Clean Fuels Standard and its work to advance zero-emission transportation. We welcome the opportunity to provide any additional input or technical assistance relating to clean and renewable hydrogen as needed. Many thanks for your consideration and support.

Sincerely,

A handwritten signature in black ink, appearing to read 'R Smith', with a stylized flourish at the end.

Rebecca Smith
Senior Director, Policy + Advocacy
Renewable Hydrogen Alliance