

Sept 23, 2026

Lauren Sanner
Rulemaking Lead
Washington Department of Ecology

Re: Comment on draft 2028 - 2038 carbon intensity reduction schedule options

Dear Ms. Sanner,

SRECTrade, Inc. (dba Xpansiv Managed Solutions) appreciates the opportunity to provide comments on the Washington State Department of Ecology's Clean Fuel Standard Rulemaking. We respectfully submit the following comments to Ecology in response to the discussion paper on CFS's carbon intensity reduction schedule shared on Sept 8, 2026.

Support for Scenario C Carbon Intensity Reduction Schedule

Xpansiv supports Scenario C for the carbon intensity reduction schedule. The consistent annual reductions from 2028 through 2031 provide greater market stability and predictability for program participants. A more gradual and uniform stepdown schedule allows credit generators, regulated parties, and investors to better forecast future credit generation and compliance obligations.

Predictable annual reductions help market participants make long-term investment decisions and provide greater confidence when evaluating project economics. For organizations like Xpansiv that support clients participating in clean fuels markets, a stable reduction schedule improves our ability to forecast credit volumes, model future revenue streams, and help clients plan investments in low-carbon transportation technologies.

We appreciate Ecology's commitment to maintaining a strong and effective Clean Fuel Standard program and thank you very much for your time and consideration as you review these comments. We welcome the opportunity for further clarification and discussion of our comments.



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.