



Seattle City Light

700 5th Ave. | P.O. Box 34023 | Seattle WA 98124-4023
TEL (206) 684-3000 TTY/TDD (206) 684-3225 FAX (206) 625-3709
seattle.gov/city-light    

September 30, 2026

Lauren Senner
Washington State Department of Ecology
Climate Pollution Reduction Program
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Sanner and Department of Ecology CFS Rulemaking staff,

On behalf of Seattle City Light, I am writing to provide public comment regarding the Department of Ecology's (Ecology's) discussion paper on the carbon intensity targets for the Clean Fuel Standard (CFS) for the years 2028-2031.

City Light is a strong supporter of the CFS and appreciates Ecology's ongoing work to implement it. Consistent with our mission as a municipal, community-owned utility, all of City Light's CFS credit proceeds will be reinvested to support transportation electrification, reduce greenhouse gas emissions and air pollution, and advance equitable access to transportation electrification. City Light has proposed a \$10 million budget request in 2027 to support our electrification efforts.

Although the differences in carbon intensity reduction scenarios are subtle, we encourage Ecology to select Scenario A because it achieves a larger reduction in 2028 than the other two scenarios, resulting in greater near-term impacts on transportation-related greenhouse gas emissions and air pollution. Scenario A is also consistent with previous years' targets (4 percent in 2027) and is easy to communicate to stakeholders with a 3 percent reduction thereafter through 2038.

We are grateful for Ecology's leadership in implementing the Clean Fuel Standard and look forward to continued collaboration in advancing Washington towards a cleaner, more equitable transportation system.

Sincerely,

Landon Bosisio
Transportation Electrification Advisor
Seattle City Light