CHRISTIANSON
CPAs & Consultants

November 4, 2026

Washington State Department of Ecology
Clean Fuel Standard Department

RE: Clean Fuel Standard Rulemaking – Comments on GREET 4.0 Transition and the Timing of Washington-Specific Verifier Accreditation and Training

Dear Department of Ecology CFS rulemaking team,

Christianson PLLP is a full-service public accounting firm based in Willmar, Minnesota, with over 35 years of experience serving the renewable fuels industry. We specialize in providing technical assistance and professional services that ensure industry compliance and support sustainable practices.

As a trusted third-party verification body for several biofuel producers participating in Washington's Clean Fuel Standard program, we remain engaged in the rulemaking process and appreciate the opportunity to provide our perspective.

Timing of Washington-Specific Verifier Accreditation and Training

For new pathway applications submitted beginning in January 2028, Washington will require the use of GREET 3.0 and GREET 4.0. To ensure verification bodies are prepared to meet these requirements, we suggest Ecology begin accepting accreditation applications in fall/winter 2026, with Washington-specific training and testing available beginning in January 2027.

This timeline would allot verification bodies sufficient time to place their personnel through the required training and testing, complete the engagement process and obtain Ecology's review and approval. It would also allow time for any necessary retesting before the January 2028 implementation date.

Additionally, we find that beginning the training process in January 2027 is particularly important given the timing of existing verification obligations. Summer is a peak audit period for verification bodies, in part due to California LCFS verification requirements. In order to reduce the likelihood of scheduling changes, starting the training process in January 2027 or shortly after, would leave time to address any deficiencies and secure approval before January 2028.

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We at Christianson PLLP thank you for your time and consideration and are grateful for the opportunity to contribute in the rulemaking process. Please reach out to us if you have any questions.

Sincerely,



Kari Buttenhoff, CPA
Partner, Christianson PLLP

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