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Ryan Kenny
Senior Public Policy and Regulatory Affairs Advisor



July 10, 2015

Mr. Peter Moulton
Washington Department of Commerce
PO Box 42525
Olympia, WA 98504

Dear Mr. Moulton:

On behalf of Clean Energy, I would like to commend the efforts of the Department to improve the draft rules related to Chapter 194-29. With the goal of reducing petroleum use and emissions, we feel these rules are one step closer to that end objective.

As North America's largest provider of natural gas transportation fuel with over seventeen years of industry leading experience, we provide an array of services that parallel the Department's goals of climate change reduction. We have a deep understanding of the growing marketplace, and our portfolio includes 550 stations in 43 states; 13 of which are located within the state of Washington. Nearly all of these stations provide renewable natural gas (RNG) as compressed natural gas (CNG) or liquefied natural gas (LNG) vehicle fuel.

This communication suggests ways in which these draft rules can be augmented in order to reach the Department's goals.

General Comments

The transportation fueling industry is constantly evolving. The original legislation necessitating these rules was passed nearly a decade ago. In the process of revising these rules, we must be conscious of the variables that may present themselves in the future. Maintaining fuel neutrality, while making strides towards climate change reduction, is crucial to the success of this legislation.

Clean Energy supports the definitions outlined in WAC 194-29-020. These clarifications—specifically the explanation of "practicability"—will allow for certainty in the implementation of these rules.

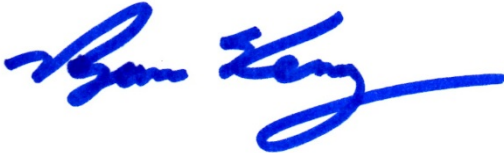
Specific Comments

WAC 194-29-070 (1)(b)(c). These two sections should consider omitting "if the criteria in (a) and (b) cannot be met" in order to ensure fuel neutrality. There could be variables in which a consumer might consider natural gas, propane, etc. as their first choice.

WAC 194-29-070 (2)(c). Renewable natural gas is much more accessible than in years past. This section should acknowledge this availability and allow local governments to purchase blends of renewable natural gas, comparable to the sentiment of (2)(a).

Clean Energy appreciates the opportunity to submit comments on WAC 194-29. Thank you for taking them into consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Kenny". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ryan Kenny
Senior Public Policy & Regulatory Affairs Advisor
Clean Energy