



Western Washington Clean Cities Coalition

1904 Third Avenue, Suite 105

Seattle, WA 98101

www.wwcleancities.org

July 7, 2015

Peter Moulton
Washington State Department of Commerce Energy Office
PO Box 42525
Olympia, WA 98504

RE: Proposed Rule Chapter 194-29 WAC: PRACTICABLE USE OF ELECTRICITY AND BIOFUELS TO FUEL LOCAL GOVERNMENT VEHICLES, VESSELS, AND CONSTRUCTION EQUIPMENT

Dear Mr. Moulton,

Western Washington Clean Cities respectfully submits these comments related to the proposed local government alternative fuel rule referenced above.

Western Washington Clean Cities is a not-for-profit membership organization dedicated to expanding the use and availability of alternative fuels and advanced vehicle technologies in the Pacific Northwest. This proposed rule aligns well with our goals to help our members reduce their use of imported petroleum in the transportation sector. The proposed rule also considers the constraints and challenges that affected governments may face in complying with its requirements, and sets forth reasonable and achievable criteria for determining what is "practicable." We appreciate the Washington State Department of Commerce's (Commerce) efforts to craft this rule.

Further, we ask that Commerce consider the following change:

- **Revise the biofuel cost criterion to address small price fluctuations.** The proposed new section 194-29-070(2), directs affected parties to *"use a minimum five percent biodiesel blended fuel in all applications when the fuel is available... at a price equal to or less than #2 ultra-low sulfur diesel"*.

Pricing for B5 biodiesel trends closely with petroleum diesel, often providing a discount relative to petroleum diesel. Petroleum markets are prone to shifts, however, and occasionally the price of B5 exceeds that of petroleum diesel. To provide continuity of biofuel use during temporary, minor price fluctuations, we recommend that Commerce revise the rules to require affected parties to use biodiesel when it's available *"...at a price no more than one percent higher than #2 ultra-low sulfur diesel."*

Respectfully submitted,

Kimberley Cline
Coordinator
Partnerships, Policy & Outreach

Scott DeWees
Coordinator
Alternative Fuels & Technologies