

Clean Fuel Standard Participation Guidance

Seeking Approval to Estimate eForklift Electricity Consumption

Background

WAC 173-424-420(3)(f)(ii) states that the reporting entity may submit a written statement to Ecology demonstrating the reasons they are unable to provide measured electricity data and that, upon receiving Ecology approval, they may use an estimation method to determine credit generation. Ecology strives to maintain a high data quality standard in the Clean Fuel standard, and will therefore seek to minimize the use of estimation methodology.

Requirements

Beginning in quarter 2 of 2023, registered parties must demonstrate to Ecology that they are unable to provide measured electricity data for a facility where electricity is dispensed to electric forklifts due to one of the following reasons:

- The cost of deploying metering technology is higher than the estimated revenue potential of participating in the CFS program for one year.
- Metering technology is in the process of being deployed but is not yet operational.

Registered parties must demonstrate the cost of deploying metering technology by providing copies of three or more quotes for metering equipment and installation. Quotes should be provided for multiple metering technologies, demonstrating a range of costs. Staff may require additional quotes if they determine that all of the quotes provided are for cost-prohibitive technology and more cost-effective options are available.

Registered parties must estimate the revenue potential based on the number of forklifts at the facility being registered and the average credit price over the previous 6-month period. If there is no data available for the current credit price, they must use the average of the most recent annual credit prices reported in the California and Oregon clean fuel standard programs.

Instructions

The information described above must be summarized in a memo and emailed to WFRSAdmin@ecy.wa.gov with the subject "Request to Estimate eForklift Electricity Consumption". If the registered party is demonstrating that the cost of deploying metering technology is higher than the estimated revenue potential of participating in the CFS program for one year, they must include copies of three or more quotes as attachments to that email.

Approval Process

If a registered party demonstrates that the cost of metering technology is higher than the estimated revenue potential of participating in the CFS program for one year, they will be issued a fuel supplying equipment (FSE) ID that may be used for two reporting periods. After using an FSE ID for two quarters of reporting, they will have to reestablish eligibility to use estimation methodology based on an updated estimate of revenue potential. This estimate must be made using the number of credits generated for that FSE ID in the previous 6-month period and the average credit price of that same 6-month period.

If a registered party provides evidence that they are in the process of deploying metering technology at a facility, they will be issued an FSE ID that expires after one reporting period. After using an FSE ID for one quarter, they will be required to begin using metered data OR reestablish eligibility to use estimation methodology.

Registered parties who have received Ecology approval to use an estimation methodology **will not be eligible to use an estimation methodology for longer than a 12-month period**. After 12 months, they will be required to report metered data if they wish to generate credits in the CFS program. Those who are approved in Q1 2023 to use an estimation methodology must begin reporting metered data for the charging at that facility by Q1 2024 if they wish to continue generating credits.

Contact

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ADA Accessibility

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyADAcoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.