



Clean Fuel Standard Participation Fee 2025

Workload analysis, estimated budget, proposed fee

Introduction

Ecology charges a fee to participate in the Clean Fuel Standard program, as explained in the fee rule (WAC 173-455-150¹). This fee helps pay the cost of running the program and is based on the estimated budget for the year. Everyone in the program must pay a fee.

In 2025, Ecology will determine who has credits or deficit based on reports submitted during in 2024.

The fee rule requires Ecology to:

- Post the draft 2025 workload analysis, annual budget, estimated fees, and list of deficit generators on Ecology's website by May 15, 2025.
- Provide 30 days for public comment.
- Post the final workload analysis, budget, and fees by June 30, 2025.

Workload analysis

A core team of staff work full-time to run the Clean Fuel Standard. Other staff from the Climate Pollution Reduction Program help when needed.

- Green House Gases Inventory and Transportation Section Manager (WMS Band 2)
- Technical Lead (Environmental Planner 5)
- Fuel Pathway Specialists (Natural Resource Scientist 4, two positions)
- Community Outreach & Environmental Education Specialist 4
- Rulemaking staff (Environmental Planner 3)
- Program Analyst (Environmental Specialist 4)
- Partnership Specialist (Environmental Specialist 4)
- Administrative Assistant 3
- Administrative Intern
- Environmental Specialist 3 (HB 1409)
- Environmental Specialist 4 (HB 1409)
- Financial Examiner 2 (HB 1409)

Estimated annual budget

The estimated budget for 2025 is based on workload assessments performed by Ecology and Commerce, which is responsible for the annual fuel supply forecast. The budget covers staff and other costs needed to run the CFS program and meet legal requirements.

When this document is published, the Washington legislature is still determining the budget for [HB 1409](#), which will impact the fee for 2025, including the three FTE listed above. We have included the costs associated with implementation of this bill in this estimate. If that changes, we will explain the difference in the final fee document published on June 30.

The program uses a calendar year for fees, but Ecology plans its budget by fiscal year. So, the costs below include half of each fiscal year that makes up calendar year 2025. We rounded the numbers to the nearest whole dollar.

¹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-455-150>

Estimated 2025 Budget for CFS Implementation

**The funding for the WA Fuel Reporting System (WFRS) update was submitted to the Governor's 2026-27 budget. Some funds are in the process of being reappropriated from the prior biennium due to delays in beginning work on updating WFRS in coordination with the California Air Resources Board.*

Total Estimated budget for 2025	FTE	Total Cost
Total Ecology Staffing Costs	13.19	\$1,671,903
Other Cost		
Professional Service Contracts: Fuel supply forecast (Commerce)		\$100,000
Senior Energy Policy Specialist: Fuel supply forecast (Commerce)	0.1	\$100,000
Professional Services Contract: CFS cost analysis for annual legislative report		\$50,000
Professional Services Contract: CFS market forecasting (HB 1409)		\$225,000
WA Fuel Reporting System*		\$250,000
Goods and Services		\$68,905
Travel		\$20,616
Equipment		\$13,599
Total Other Costs		\$828,119
Grand total estimated budget for CFS implementation in 2025		\$2,500,022

Table 1: Breakdown of estimated Ecology staffing and other costs for implementing the Clean Fuel Standard (CFS) in 2025. Includes notes on WA Fuel Reporting System funding status.

Estimated fee for 2025

All participants must pay the flat participation fee. If a participant generates deficits, they must pay an additional fee. This fee is categorized based on how many deficits they earned in 2024. Only fuels that had a carbon intensity higher than the standard in 2024 will be considered deficit generators for this fee. These fuels will be placed into a deficit generator fee category. Fee categories are based on how many pure deficits a fuel generated, not the net amount that accounts for credits a deficit generator may have in their account as well. A list of participants who fall into this category will be posted on the CFS [Program Documents page](#) under the 'Participation fee' section.

Under the fee rule, the 2025 fee will be split like this:

- 5% of the estimated budget is covered by all participants (both credit and deficit generators).
- 95% of the program cost is covered by deficit generators based on the amount of deficits generated in reports submitted in 2024.

2025 Budget Allocation Summary

Percentage of total budget	Total dollar amount per category
95% of total – deficit generators	\$2,375,021
5% of total – all participants	\$125,001

Table 2: This table shows the total dollar amount for 2025 and the breakdown of that total into 95% and 5% portions.

Proposed Fee Structure for Clean Fuel Standard Participants

Proposed fee structure	Number of participants in this category	Allocation of budget per category	Fee amount per participant
Participation fee <i>Representing 5% of the estimated program cost.</i>	330	\$125,001	\$379
Category 1 <i>Top 30% of deficit generators, 70% of deficit fee amount.</i>	17	\$1,662,515	\$97,795
Category 2 <i>Middle 30% of deficit generators, 20% of deficit fee amount.</i>	17	\$475,004	\$27,941
Category 3 <i>Lower 30% of deficit generators, 10% of deficit fee amount.</i>	17	\$237,502	\$ 13,971
Lowest 10% of deficit generators <i>Only paying the participation fee.</i>	5	0	N/A

Table 3: Breakdown of the proposed participation and deficit-based fees for CFS participants, grouped by categories based on the number of deficits generated. The participation fee represents 5% of the program's estimated cost.

Deficit generators categories

The deficit generator fee is based on how many deficits a participant generated in 2024:

- Category 1: More than **875** deficits
- Category 2: **455 – 874** deficits
- Category 3: **4 – 454** deficits
- Category 4: **3** or fewer deficits

Fee true-up from previous years

The fee is set each year based on estimates, and only after that fact are we able to compare that estimate to actual revenue collected. This means that we are able to adjust the fee in future years based on differences between the estimate and the actual from past years, which is what we have done in the 2025 fee when the actual program costs were lower than previously estimated. This is reflected in the budget above. If you have questions about this, please contact CFS@ecy.wa.gov.



CFS Team
CFS@ecy.wa.gov



To request an ADA accommodation, contact Ecology by phone at 360-407-6800 or email at Heather.Curtis@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-634