

February 11, 2020

VIA WASHINGTON DEPARTMENT OF ECOLOGY COMMENT PORTAL

Debebe Dererie
Washington Department of Ecology
300 Desmond Dr. SE
Lacey, WA 98503

Re: Pacific Power's Response to Washington Department of Ecology's January 14, 2020 Initial Clean Energy Transformation Act Rulemaking Workshop

PacifiCorp dba Pacific Power and Light Company (PacifiCorp) appreciates the opportunity to provide comments as part of the Clean Energy Transformation Act (CETA) rulemaking process regarding greenhouse gas emissions content of electricity. The initial rulemaking workshop held by the Washington Department of Ecology (Ecology) on January 14, 2020, was informative, and PacifiCorp looks forward to continued engagement as part of this rulemaking process in the coming months.

Greenhouse Gas Emissions Intensity and Reporting (RCW 19.405)

During the January 14 workshop, Ecology referenced that it is required to publish rules for utilities to calculate greenhouse gas emissions content in electricity.¹ This calculation will use either the Energy Independence Act (EIA) method or the Environmental Protection Agency (EPA) method. It is also PacifiCorp's understanding that Ecology's rules will set forth technical requirements for reporting but that there will be no additional required reporting to Ecology. PacifiCorp recommends three issues for consideration in this rulemaking to provide consistency, to the extent possible, between CETA emissions reporting, and existing emissions and fuel mix reporting to the Washington Department of Commerce today.

Inclusion of non-emitting generation and renewable resources. Equation 1 in the proposed rules does not allow entities to include non-emitting generation and renewable resources in its overall emissions calculation. PacifiCorp believes this is inconsistent with Energy Independence Act emissions reporting² and represents an inaccurate view for Washington customers of the overall emissions content of the resources used to serve their load.

Not all resources have an EIA or EPA identifier. Assuming Ecology incorporates a requirement for verification of non-emitting sources, there may be a situation in which a renewable resource is not sufficiently large to qualify for an EIA or EPA ID. Some examples are very small hydroelectric facilities, wind, solar, and methane-fueled qualifying facilities, etc. PacifiCorp requests clarification for how to calculate emissions content for these resources and encourages Ecology to consider building flexibility into the rule that allows Ecology to provide alternatives to the EIA or EPA method such as WREGIS IDs.

¹ RCW 19.405.070(1)

² WAC 480-109-300

Provision for multi-state allocation protocols. PacifiCorp respectfully requests Ecology consider a provision that allows for allocation of emissions content to Washington customers based on a Commission-approved allocation methodology.

Pacific Power appreciates the opportunity to provide comment at this early stage, and looks forward to continued collaboration with stakeholders throughout the CETA implementation process.

It is respectfully requested that all communications related to this proceeding be sent to the following:

By Email: WashingtonDockets@pacificorp.com
IRP@pacificorp.com

Please direct informal inquiries to Jacob Goodspeed, Regulatory Affairs Project Manager, at (503) 813-6840.

Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Lockey', with a long horizontal flourish extending to the right.

Etta Lockey
Vice President, Regulation
Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
etta.lockey@pacificorp.com