

March 27, 2020

WASHINGTON DEPARTMENT OF ECOLOGY
300 DESMOND DR SE
LACEY, WA 98503

RE: Comments on Department of Ecology rulemaking on Clean Energy Transformation Act, Energy Transformation Projects

Dear Washington Department of Ecology,

Seattle City Light (City Light) appreciates the opportunity to provide feedback on the proposed draft rule for Energy Transformation Projects (ETPs), which was presented at the workshop on February 12, 2020 by the Washington State Department of Ecology (Ecology), with further clarification on the matter at the March 16, 2020 workshop. City Light understands that Ecology has been mandated to create rules for the ETPs, an alternative compliance mechanism under the Clean Energy Transformation Act (CETA), RCW 19.405 et seq.

City Light agrees with Ecology's current position that its statutory authority under CETA is limited to developing protocols for specific ETP project types and not to developing projects themselves. However, the draft rule still lacks clarity, which has created some confusion among the stakeholders. City Light recommends a small amendment in Sections V-VIII to clarify this point. Alternatively, a new section could be added to this draft which clarifies this specifically. In this way, any future misunderstanding regarding this topic is clearly addressed within the rule.

In addition, City Light agrees with the submitted comments from Snohomish County Public Utility District that Ecology could play an important, voluntary role in providing guidance as to whether an ETP meets the standards set under CETA. This strategy parallels current methods under the Energy Independence Act for energy conservation investments. In addition to this, City Light supports the idea of an advisory document, which would not be exclusive nor limiting, that provides sample ETPs that would be deemed acceptable under CETA.

Sincerely,

Tom DeBoer
Chief Environmental Officer
Seattle City Light

cc: Mendy Droke, City Light Regulatory Affairs
Annette Pearson, City Light Natural Resource & Permitting Manager
Emeka Anyanwu, Engineering and Technology Innovation Officer
Craig Smith, Customer Energy Solutions Director
Maura Brueger, Governmental Affairs Director