

January 24, 2020

Debebe Dererie
Department of Ecology
PO Box 47600
Olympia, WA 98504

Dear Mr. Dererie,

Thank you for the opportunity to comment on important considerations in the Ecology rulemaking process for Energy Transformation Projects (ETPs) and greenhouse gas (GHGs) content calculations under the Clean Energy Transformation Act (CETA).

As Ecology considers next steps, we'd like to highlight the following points around GHG content calculations.

- All utilities should report their GHG content calculation regardless of compliance method.
- All utilities should report their GHG content calculation for all power generated in order to meet retail Washington load, not just the electricity ultimately consumed by the end user. A transmission loss factor is important to accurately calculating GHG content.
- If a source unit of some amount of power cannot be identified, then the power should be defined as unspecified power.
- All utilities should report greenhouse gas content calculations unit by unit, rather than fuel type.

As Ecology considers next steps, we'd also like to highlight the following point around ETPs.

- Investments in ETPs must be linked to emissions reductions not relied upon to meet the standards for 2026, 2030 and 2045; and those emissions must be "real, specific, identifiable, quantifiable, permanent and verifiable." Therefore, projects must have verified emissions reductions prior to fulfilling a CETA compliance obligation.

Thank you for soliciting input as you proceed in this important rulemaking. We encourage you to continue to coordinate with other relevant agencies, and involve the public in this process meaningfully.

Sincerely,

Eleanor Bastian
Climate and Clean Energy Policy Manager