

# Solar Installers of Washington

Oct. 14, 2020

Re: Draft CETA rules 173-444-080 - Procedures for Energy Transformation Projects  
Comments from Solar Installers of Washington

Solar Installers of Washington, Inc. (SIW) is a statewide professional trade association established in October 2013 to be a unified voice for the common business interests of its members, particularly related to public policy, legislation, and governmental relations. SIW educates legislators and regulators while promoting public understanding about the impacts of policies related to solar energy in the State of Washington.

SIW is concerned that the provisions of this section that mandate third party verification in both the planning and implementation of ETP projects will produce cost burdens that will discourage electric utilities from using these projects to meet CETA targets.

Both in the design of the ETP criteria themselves in the draft rules as well as the current regulatory schema, other agencies (Commerce, UTC and the governing boards of public electric utilities) already have robust processes in place to ensure approved ETPs meet specific carbon reduction targets and overall CETA goals as well as comply with the existing regulatory framework. A duplicative layer of third party review may both slow implementation of ETPs by electric utilities and skew their internal cost calculations in a way that undermines their feasibility as a CETA compliance mechanism.

ETPs are designed to foster creative, innovative and cost-effective ways to reduce greenhouse gas emissions. An appropriate but less burdensome regulatory approach would help unleash that potential and meet the Legislative intent of "significant and swift" GHG emissions.

Respectfully submitted.

Dana Brandt, President  
& Board of Directors  
Solar Installers of Washington



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