Seattle City Light

For the Mid-C trading and using ICE, there will need to be a market created for both ICE and Brokers. It would need to specify Generator (Generator plant named) in Washington state with a guarantee sink in Washington. This is not normal practice today. Also, When the energy is tagged, have a place to add a comment stating this energy cannot be resupplied outside of Washington and the sink cannot be changed. modification to the e-tag standard to better capture source/sink regardless of intervening transactions. We do not want to lose the WREGIS REC tracking capability as we move fwd.

The CCA is silent on REC's and the reporting rule only mentions imports and RECs. Consistent reporting for imports and in-state generation is important. The purpose should be to show that any generation is not emitting, and for renewables that means showing the RECs and what happens to it.

If there are modifications to the E-Tag program, we do not want to lose the WREGIS REC tracking capability as we move forward.