

November 16, 2021

Filed Via Web Portal

ATTN: RACHEL ASSINK
DEPARTMENT OF ECOLOGY
AIR QUALITY PROGRAM
P.O. BOX 47600
OLYMPIA WA 98504-7600

RE: Rulemaking – Chapter 173-441 WAC, Reporting of Emissions of Greenhouse Gases

Seattle City Light (City Light) appreciates the opportunity to provide comments to the Department of Ecology (Department) on the proposed rule for updating Chapter 173-441 WAC, Reporting of Emissions of Greenhouse Gases.

City Light is committed to producing and delivering environmentally responsible, safe, low-cost, and reliable power and is proud to be an industry leader in clean energy and on climate action. For over two decades, we have been researching and measuring our greenhouse gas emissions and, in 2005, became the first electric utility in the country to meet greenhouse gas neutrality goals.

Through our engagement in the development of voluntary greenhouse gas reporting programs, and our participation in both voluntary and mandatory reporting programs, we have established an understanding of what makes a program effective and implementable. Our comments reflect this experience in the hope they will ensure the Climate Commitment Act (CCA, chp. 70A.65 RCW) is successful in achieving Washington state's emission reduction goals. City Light also incorporates by reference the comments of the Joint Utilities, the Public Generating Pool (PGP) and the Western Power Trading Forum (WPTF) as set forth below.

Increasing Alignment with Other Jurisdictions

As required by the Climate Commitment Act, the Department has been tasked with considering opportunities to implement the program in a manner that allows for linkage with other jurisdictions and to evaluate whether such linkage would provide for a more cost-effective means for covered entities to meet their compliance obligations within the state. We encourage linkage with other jurisdictions and the implementation of consistent systems to help support a cost-effective and successful program.

We applaud the Department's efforts to engage with stakeholders and incorporate their feedback throughout this rulemaking process, including efforts to increase alignment with other jurisdictions by adjusting reporting deadlines and allowing the use of verifiers approved by the California Air Resources Board (CARB). This alignment may allow reporters to develop a more streamlined approach to reporting

and verification under multiple programs. We do, however, request that the Department monitor the availability of CARB-approved verifiers and consider whether existing verifier supply will meet expected demands. If approved verifiers are not available, the Department should allow for additional compliance options.

As it continues to explore additional linkage opportunities, we encourage the Department to consider the use of consistent reporting protocols, forms, workbooks, and systems and to publish facility/unit emission factors that are aligned with other jurisdictions. By using an approach that is consistent with other jurisdictions (e.g., using CARB ONE workbook and Cal/EPA e-GGRT for all reporting), reporters can streamline and simplify reporting. Using similar process and reporting systems may also reduce complexity and confusion for verifiers, which can help reduce verification effort and cost for all parties.

Engagement with Utilities and Other Stakeholders

We support deferring the adoption of rules and methods for reporting the California Independent System Operator's Western Energy Imbalance Market (EIM) transactions and encourage the Department to use the time allotted in the CCA to continue stakeholder workshops and collaboration. As member of the Joint Utilities, who has submitted separate comments on this matter, we support their recommendation to organize additional technical workshops to address the concerns of electric power entities relating to the interim reporting approach for EIM transactions. City Light is a member of the PGP and incorporates their comments by reference. City Light is also a member of the WPTF who has submitted separate comments on this matter. Seattle supports those comments to the extent that they apply to reporting requirements potentially applicable to City Light.

In addition to this, we encourage the Department to continue working with utilities to understand the best methods for gauging allowance needs based on this new set of reporting rules.

It is important for the Department to understand that utilities within Washington state have multiple, new reporting obligations. We respectfully request that the Department consider the time and effort that will be required to provide adequate support to reporters and the value of providing additional FAQs, trainings, workshops, forms/workbooks, staff, etc., to provide clarity on reporting and compliance. For example, new reporters are looking for additional clarity on reporting due dates. We suggest the Department provide clarity on the emission years that new reporters, such as electric power entities, would be required to report. Providing clear guidance will allow these new reporters to begin collecting the information necessary for compliance.

We look forward to continued engagement with the Department on this work. Thank you for the opportunity to comment on the proposed rule.

Sincerely,

Robert W. Cromwell, Jr.
Director, Customer Energy Solutions

Seattle City Light