

Bonneville Power Administration

Hi, good morning. This is Alisa Kaseweter. I'm commenting on behalf of the Bonneville Power Administration. We're a federal power marketing administration and sell power to over 60 public utilities in Washington. We refer to these utilities as our preference customers. Because we make system sales, we're an approved asset-controlling supplier or ACS for CARB's Cap-and-Trade Program and we intend to be for the Washington Climate Commitment Act as well. Additionally, we'll be joining the EIM in March of 2022. We appreciate the willingness of Ecology staff to work with us to understand and clarify Washington's electricity sector greenhouse gas reporting rules. We'd like to highlight two key areas of concern today and I'll expand on both of these in our written comments. First, the proposed language is centered around reporting electricity imports based on e-Tags. However, for sales to our preference customers that are within our balancing authority, there are often no e-Tags. Because of this, the proposed rule language could have adverse impacts on our preference customers. For example, per the language, the only way to claim ACS power is for the ACS to be identified on the e-Tag. The rule should clarify that preference customers' purchasing power from BPA under long-term power sales agreements can claim ACS power as well. The utilities' reportable amount of greenhouse gas emissions from Bonneville purchases would then be based on total sales from the meter data, not e-Tags. Second, while we appreciate Ecology's efforts to revise the EIM language, we believe the language as currently drafted is still problematic. We support assigning the unspecified emissions factor to EIM imports and note it should be the same as CARB's at 0.428 metric tons carbon dioxide equivalency per megawatt-hour. However, we find the language describing the EIM importer and EIM purchaser to be confusing and problematic. We're not sure if Ecology intends to define the covered entity under the CCA by way of defining the EIM importer in these proposed reporting rules, but it appears to Bonneville that the language as proposed does do that. If Ecology intends this, then more time is needed to discuss the appropriate covered entity. If it's not in Ecology's intent, then the language should be clarified to acknowledge that it is just referencing reporting obligations. Again, we'll follow up with additional detail in written comments. Thank you.