

City of Seattle, Office of Sustainability and Environment

We recommend Ecology define a mechanism in rulemaking to track and monitor spending of funding received from auctioning no cost allowances, and work with utilities to establish this mechanism. Since the number of allowances will be reduced overtime, the mechanism should address how low-income households will not be affected from potential rate increases as a result of utilities needing to cover their remaining emissions through auction purchases and who may therefore rate-base those costs.

We recommend adding language in section WAC 173-446-300 to make it clear that electric and natural gas utilities have the ability to auction up to 100% of their no cost allowances, beyond the minimum thresholds outlined in the draft rule, in order to minimize additional cost burden to low-income households from the implementation of the Climate Commitment Act.

Thank you for the opportunity to comment.