

## James Adcock

Re Imports and Exports of Electricity -- while I agree in general I would prefer accuracy in calculation of emissions of Imports, under CETA and RECs there are issues of how accurately Exports of electricity are specified -- whether facilities and rates are accurately specified, or simply rated as "Unspecified" -- and I think it is important to have a set of rules on a state-wide basis -- CCA and CETA -- which treat Electricity Imports and Exports on an equal and consistent basis -- lest one or the other receive a distortive benefit.

Re Electrical Utilities and CETA vs CCA -- while I think Ecology is pretty much constrained by CCA requirements, to the extent possible I think Ecology should be careful that their rules do not reward "foot dragging" and "excuse making" by Electrical Utilities re CETA, but rather supports the generally accepted idea that the utilities need to follow a "linear glidepath" over the 2020 to 2030 timeframe in terms of actually incrementally progressing towards the 2030 80% plain language requirements of CETA.