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Regarding the new CCA and EITE Industries: I have not been able to identify any initial investment incentives within the CCA for a brand "new" EITE facility (under design) to invest "early," in lower carbon emission equipment or processes. Without CCA incentives of some sort being in place, a new EITE facility may not consider cleaner technology when a new facility is being designed. In fact, CCA may be considered detrimental to a facility/company considering deployment of cleaner technology. It would lower the company's emissions at a time when emissions reductions are not required (first four years of operation = the 1st compliance period). It may not make sense (for the EITE) to pursue or purchase lower carbon emission equipment or processes when designing/building the new facility because, emission reductions will be needed further down the road (in the 2nd compliance period) rather than at startup.

This would be unfortunate because, in this situation, a new facility would most likely purchase standard equipment rather than/instead of more expensive (newer/cleaner) technology. As noted, it would not be until the 2nd compliance period that GHG emission reductions would be needed. At that time, more investment simply may not be possible (because the money has already been spent on the standard equipment).

It almost seems like the CCA is creating a bit of a disincentive for new EITE facilities regarding "early" deployment of cleaner technology. Wouldn't it be unfortunate if a new facility decides to wait for years to expire before even considering cleaner technology, when the actual opportunity (opportune time) existed 4 years earlier? It is also possible that the facility ends up passing on the cleaner technology for the long term – never pursuing/purchasing cleaner technology. Might Ecology be able to review this situation/issue and consider program incentives rather than unintentionally having a potential disincentive built into the new regulations? Possibly compare standard or conventional equipment emissions against emissions from cleaner technology and issuing some type of incentive credit related to the difference in emissions? This type of approach could spur early investment in cleaner technology rather than potentially repressing it.