# PacifiCorp

January 26, 2022

Attn: Rachel Assink
Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Attn: Cooper Garbe
Rulemaking Lead
Department of Ecology

Re: Rulemaking – Chapter 173-446 WAC, Climate Commitment Act Program

On January 5, 2022, the Washington Department of Ecology (Ecology) issued a second informal draft rules proposing a new Chapter 173-446 WAC (Climate Commitment Act Program) and solicited comments on the draft rules by January 26, 2022. PacifiCorp respectfully submit the following comments on these draft rules.

GENERAL COMMENTS

PacifiCorp is committed to working with Ecology to ensure it contributes to its proportional share of emissions reductions and does so in a least cost least risk manner for its customers while continuing to provide reliable electricity service. PacifiCorp supports the comments submitted by Avista, PacifiCorp, the Public Generating Pool, and Puget Sound Energy (Joint Utilities), January 26, 2022, in this proceeding and requests Ecology consult the WUTC, the Department of Commerce, and the utilities in the development of rules that establish the program design and treatment of the electric sector.

In addition to the comments offered by the Joint Utilities, PacifiCorp also asks that Ecology work further with the company on the calculation of multijurisdictional imports under Ecology's Greenhouse Gas Reporting Rule. These rules and calculation are inextricably linked with Ecology's Climate Commitment Act program rules and will have meaningful impacts for PacifiCorp's imported emissions obligation, its proportional share of the sector baseline, and the cost burden to comply with the cap-and-invest program.

CONCLUSION

PacifiCorp appreciates the opportunity to provide comments in response to Ecology's draft rules. Thank you for your thoughtful consideration of this program. We look forward to further discussion.

Sincerely,

/s/ Mike Wilding
Mike Wilding
Vice President, Energy Supply Management
Pacific Power

PACIFIC POWER
A DIVISION OF PACIFICORP

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In addition to the comments offered by the Joint Utilities, PacifiCorp also asks that Ecology work further with the company on the calculation of multijurisdictional imports under Ecology's Greenhouse Gas Reporting Rule.[1] These rules and calculation are inextricably linked with Ecology's Climate Commitment Act program rules[2] and will have meaningful impacts for PacifiCorp's imported emissions obligation, its proportional share of the sector baseline, and the cost burden to comply with the cap-and-invest program.

[1] Chapter 173-441 WAC, Reporting of Emissions of Greenhouse Gases
[2] Chapter 173-446 WAC, Climate Commitment Act

## CONCLUSION

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