

Chris Sherin

Good morning. This is Chris Sherin and it's C-H-R-I-S S-H-E-R-I-N. Uh, I'm the plant manager at Grays Harbor Energy Center located in Elma, Washington within the port of Grays Harbor sets up the business park. Grays Harbor Energy's an independent power producer and we began operation in 2008. Uh, our plant is a 650 megawatt modern efficient combined cycle, natural gas fired power plant that has capacity to provide enough power for over 100,000 homes. [clears throat] Grays Harbor Energy Center is one of the cleanest carbon-emitting power plants in the state per megawatt hour of electricity generated. And in 2021, upgrades to the gas turbines increased our efficiency and further reduced our carbon emissions per megawatt-hour. Most of the other carbon-emitting power plants in the state of Washington, uh, are peaking natural gas-fired plants, which on average emit about 35% more CO₂ equivalent per unit of electricity than Grays Harbor. In general, they also lack the same emission reduction equipment we have, and the same- and the same can likely be said for NO_x and CO emissions. Under the proposed rules, since Grays Harbor Energy is an IPP or Independent Power Producer. The- the only natural gas fired plant that is not owned by utility in the state, we're required to pay for the entirety of our carbon allowances while older, less efficient, higher carbon-emitting owners are given allowances for free incentivizing their operation. It is unfair to increase our operating costs an estimated \$30 to \$40 million a year and not to do the same for all similar plants. It seems contrary to the intent of the climate commitment to incentivize increased carbon emissions and the cost rate payers will incur. Most of Grays Harbor Energy Center's power is sold in Washington. However, in the future, any electricity, we-- if we were to export, um, any electricity we were to export will compete with other state plants that are not subject to the Climate Commitment Act. This puts some of the cleanest power in the region, our power, at a significant cost disadvantage against less efficient higher carbon-emitting plants. As part of- as part of our site certification agreement, greenhouse gas mitigation plan, Grays Harbor Energy Center has made annual payments purchase carbon offsets for the last 15 years totaling more than \$5 million through the climate trust. Many of the plants eligible for no-cost allowances or free allowances have not done the same. Under the proposed rule, we will receive zero credit for 13 out of our 15 years of offset purchases. Last year, Grays Harbor's Contributions to the local economy included paying nearly \$7 million in sales and use taxes and lease agreements or lease payments. Grays Harbor team consists of 23 full-time employees including eight veterans. Our jobs are high paying, we have good benefits, and the majority of positions are union. Grays Harbor also utilizes nearly 250 individual part-time contractors in one of the most economically challenged parts of the state. Since 2008, we've made over \$115,000 in community donations and provided over 550 hours of volunteer service to the community, including organizations such as our local fire departments, local schools, VFW branches, [unintelligible 00:06:36] and habitat for American closing. With respect to allowances, I ask that you please amend the proposed rules to put all similar carbon-emitting power plants in the state on the same playing field, to treat us all equally, and to be recognized for our actions to act responsibly to reduce or off- reduce or offset or emissions prior to this. Thank you.