

Virginia Davis

Thank you for the opportunity to comment on WAC-173-446, Climate Commitment Act (CCA) Program Rule.

I appreciate the hard work the Department of Ecology has been doing to implement the CCA. However, I have a concern related to the following area of the draft program rule.

Pollution Allowances

Ecology's responsibility to provide oversight and review of the allocation of allowances for Emission Intensive Trade-Exposed polluters should be strengthened and clarified to provide guidance and establish reporting requirements for consumer-owned utilities on the use of the value of no-cost allowances. Ecology should engage with the Utilities and Transportation Commission on its regulation of investor-owned utilities' use of the value of no cost allowances.

Thank you for considering my concerns.