



August 21, 2023

Gopika Patwa
Rulemaking Lead
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: **Renewable Northwest's initial comments regarding Electricity Markets Rule (Chapters 173-441 and 173-446 WAC)**

Dear Ms. Patwa:

Renewable Northwest (RNW) thanks the Washington Department of Ecology ("Ecology") for this opportunity to informally comment on the Electricity Markets Rulemaking. On March 17, 2023, a wide group of stakeholders including RNW sent a joint letter to Ecology requesting a series of public workshops to discuss electric sector issues as part of Ecology's Climate Commitment Act linkage process. RNW would like to reiterate this need for more substantial public dialogue and discussion pertaining to organized regional markets, beyond Ecology's listening session on August 17 and two draft rule language input meetings in October.

Regional electricity market development is actively in flux, with multiple bodies and organized groups in the West simultaneously tackling highly complex electricity sector issues independently. For instance, CAISO's Greenhouse Gas Coordination Working Group and Southwest Power Pool's (SPP) Markets+ Greenhouse Gas (GHG) Task Force are currently discussing or planning for conversations on GHG accounting issues, reporting issues, and data infrastructure requirements for day-ahead markets. For context, the SPP Markets+ GHG Task Force is currently scheduled to vote on tariff and market protocol decisions on October 3, 2023.

RNW is concerned that without a collaborative, robust stakeholder process, decision-making on these issues across the West will become overly complex and fractured. Moreover, Washington's position in a future market construct may be unique to other member states

considering the carbon pricing provisions of the Climate Commitment Act (CCA). It would be mutually beneficial for Ecology and the aforementioned markets work groups to publicly discuss the assumptions all parties are making about how Washington would participate in the various market designs being proposed.

To that end, we support and echo the comments made by the Public Generating Pool on August 4 to Ecology. Namely, we **encourage Ecology to provide opportunities for public presentations by and direct public dialogue with CAISO's GHG Coordination Working Group leads and SPP's Markets+ GHG Task Force staff before the scheduled October draft rule meetings.** We also support PGP's recommendation that the Utilities & Transportation Commission and the Department of Commerce participate in these workshops, given their prior involvement with implementation of the Clean Energy Transformation Act.

Additionally, given the quickly-changing nature of Western markets at this time, **Ecology may benefit from a rule reopening clause** to consider at a later date, for instance, 1) whether new tools have arisen to ease compliance reporting and review, and 2) whether there are unforeseen sources of emissions leakage to be addressed.

We appreciate the opportunity to provide feedback on this Electricity Markets Rulemaking and look forward to continued dialogue on implementing the CCA.

Sincerely,

/s/ Kate Brouns

Kate Brouns

Washington Policy Manager

Renewable Northwest

kate@renewablenw.org

/s/ Katie Ware

Katie Ware

Consultant

Renewable Northwest

katie@renewablenw.org