

Devon Kellogg

Greetings Department of Ecology,

I am a parent, teacher, and stable-climate advocate.

For the sake of our communities and our families' futures, we must push CA and Canada to adopt more stringent rules (move to 10%) rather than laxing ours (to 25%). Also please make sure combining markets doesn't allow us to ignore Scope 3 / "embodied carbon", double-count solutions, or "greenwash" our local emissions sources. It's imperative that WA meets our ambitious Climate Commitment goals!

Speaking of keeping it local, please ensure Distributed Energy Resources (DERs) and aggregate Virtual Power Plants (VPPs) aka microgrids are encouraged in this rulemaking, including but not limited to onsite solar, wind, and local battery storage (including bi-directional EVs). DERs offer cost-effective and reliable grids and enable community resiliency.

<https://www.icf.com/work/energy/distributed-energy-resources>

https://www.commerce.wa.gov/wp-content/uploads/2021/01/WA_2021SES_Chapter-F-Electricity.pdf

<https://www.energy.gov/eere/solar/solar-integration-distributed-energy-resources-and-microgrids>

<https://www.ica.org/reports/unlocking-the-potential-of-distributed-energy-resources/executive-summary>

Last but not least, please include market costs for methane emissions from waste sites, agricultural processes, and natural gas mining, transport, and use; HFCs; NOx; and SF6 gas in electrical transmission equipment. These are some of the most potent sources of heat-trapping gases. We need to make sure they are appropriately priced in the market!

Thank you for your consideration,
Devon Kellogg and Family