

Nikkole Hughes

My name is Nikkole Hughes, and I am here today on behalf of the Public Generating Pool (PGP) which is a trade association representing eight consumer-owned electric utilities in Washington and one in Oregon. Their shared characteristic is that all nine utilities own and operate their own generating resources in the Pacific Northwest. PGP appreciates the work put in by Ecology staff and stakeholders over the course of this rulemaking to develop and refine the deemed market importer framework for specified source imports through centralized electricity markets. We believe that timely adoption of these rules is critical to the functional integration of the Climate Commitment Act with centralized markets, which is key for Washington utility participation in those markets. PGP supports the overarching framework put forth by the proposed rules and we will offer minor editorial and substantive comments and suggestions in our written comments. One substantive issue we would like to raise today is that neither these proposed electricity markets rules nor the draft linkage rules currently provide back-stop provisions for identifying the deemed market importer in the event that the Bonneville Power Administration participates in a centralized electricity market but has not opted into participation in Washington's Cap-and-Invest Program. PGP provisionally recommends that the proposed rules specify that compliance obligations associated with federal power attributed to Washington through a centralized market be pro rata allocated to Washington retail providers at BPA's ACS rate if the Federal Power Marketing Administration is not an opted entity but is participating in a centralized electricity market. We will be providing specific language for this recommendation in our written comments and with that, that concludes my remarks. And I thank you for having us today. Thank you.