

Vashon Climate Action Group

Yes, this is Rob Riggs—I'm a volunteer with Vashon Climate Action Group. I've done a quick analysis here that suggests that the 10,000 ton limit would be that a 50 megawatt peaker plant with a capacity factor of 5% would be required to comply with this rule, but then two 25 megawatt peaker plants would not. I'm looking at here at the Governor's Directive and it does say it should cover major industrial projects and major fossil fuel projects, but it goes on to say that "there's a need to establish uniform methods, processes, procedures and protocols." And I really think that that's what's generally needed for all analysis—analyses that we do related to greenhouse gas emissions. So I think that there is a huge value for the rule outside of the projects that meet those higher criteria. So I hope that as a rule is developed, that recognition will be made to the, the general need for standardization of how these issues are treated in in an area that's a very technical complex and subject to change as science evolves--scientific knowledge evolves on this. So I guess that's my comment. And I thank you very much for your work.