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1. Allow participants that resist leakage (and closure) to sell no-cost allocations after 2034. This could help them fund the very large loans most participants will need to decarbonize. This is a simple solution at no-cost to WA State. Sure, some potential new revenue might be lost, but does anyone believe IMPLAN's prediction of only 248 jobs lost statewide if EITEs are unable to pass-through estimated CCA compliance costs or reduce emissions ?
2. Give ECY more discretion to enforce the CCA (and/or add a clear appeal process). This is a simple, no-cost save for WA-State. How many EITE's for example, despite attentive management, saw their third-party verification process come uncomfortably close to the CCA's almost existentially punitive, inflexible deadline ? One hiccup could spell the end for an employer.
3. Increase use of CCA proceeds for decarbonization. This could allow participants to take partial credit for participation in the program when calculating thier carbon footprints. As is, Cap and Trade harms WA's fiscal competitiveness without providing a commensurate market-distinguishing reduction in carbon footprint. [WA employers are required to pay for carbon allowances while competitors are paying for offsets or using equivalent funds for their own carbon reduction / energy projects.] Ideally, CCA-funded carbon reductions would be independently verified, for this purpose.