BENTON
RURAL ELECTRIC
ASSOCIATION

Benton Rural Electric Association
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December 19, 2024

Nikki Harris
Department of Ecology
Climate Pollution Reduction Program
P.O. Box 47600, Olympia, WA 98504-7600

via Public Comment Form

Subject: Responses to Ecology's Questions Regarding the Cap-and-Invest Linkage Rulemaking Distributed 11/19/24

Benton Rural Electric Association (Benton REA) is a member-owned, not-for-profit electric cooperative serving residential, agricultural, and commercial members across Benton, Yakima and Lewis counties in southeastern Washington. We serve approximately 12,000 members across 620 square miles, with a mission to provide reliable and affordable electric service to our rural communities.

We support the comments submitted by The Energy Authority (TEA) during this comment period.

In particular, we urge the Department of Ecology to strike the proposed language related to Balancing Energy for in-state resources, as outlined in TEA's submission. Benton REA is actively pursuing partnerships with renewable energy developers to construct clean, non-emitting generation projects to meet our growing load. Under our current power supply agreement with Bonneville Power Administration (BPA), Benton REA is required to purchase Balancing Energy from BPA to support the integration of these renewable projects.

As currently drafted, the Balancing Energy rule would improperly assign compliance obligations by attributing emissions to contracted renewable energy resources. This approach contradicts Washington State's commitment to expanding renewable energy development and undermines the policy goals set forth by the Climate Commitment Act.

We strongly recommend that Ecology revise the proposed rule and exclude Balancing Energy from the definition of electricity importer.

Thank you for your attention to this matter. Please do not hesitate to contact me with any questions. You can reach me via email at jlozano@bentonrea.org or by phone at (509) 786-8253.

Sincerely,

J. Lozano

Josh Lozano
Director of Energy Policy & Contract Management
Benton Rural Electric Association