



Columbia REA

December 19, 2024

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

[Responses to Ecology's Questions, Distributed 11/19/24, Related to the Cap-and-Invest Linkage Rulemaking](#)

Columbia Rural Electric Cooperative (CREA) is a small rural utility in eastern Washington providing electrical service to farmers, ranchers and homes in mainly non-urban areas of Walla Walla, Columbia and Umatilla counties. We serve approximately 6,750 meters over 1,900 square miles with 52 employees.

We support TEA's comments submitted as part of this comment period.

Specifically, Ecology should strike its proposed language on Balancing Energy for in state resources as TEA has commented. Columbia Rural Electric is working hard on contracting directly with renewable energy developers to construct projects locally to supply clean, non-emitting generation as part of our power generation portfolio. As part of our BPA wholesale power contract, CREA is required to purchase Balancing Energy from BPA for these projects.

As proposed, the Balancing Energy rule would create a compliance by assigning emissions to the contracted renewable energy resource. This concept goes against Washington State's policy goals of promoting new renewable energy resources.

We strongly encourage Ecology to not adopt the proposed definition of electricity importer to include Balancing Energy.

Please contact us with any questions.

Sincerely,

Dan Andrews

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