

Washington Department of Ecology
Climate Pollution Reduction Program
Delivered via Comment Portal

October 31, 2025

RE: Cap-and-Invest Program Updates and Linkage Rulemaking – House Bill 1975 Implementation

Northwest Natural (“NW Natural”) recognizes that our company will play a key role in implementing climate solutions and we appreciate Ecology’s interest in linking carbon markets with California and Quebec. In response to the questions posed in the October 15, 2025 Cap-and-Invest Public Workshop: House Bill 1975 public meeting, NW Natural would like to provide the following feedback:

NW Natural suggests that the number of future vintage allowances placed into APCR should remain at 5%. Decreasing the amount of available allowances in the APCR Auction will result in less near-term cost containment for covered entities. Reducing the cost containment capacity could have adverse cost effects on covered entities, trickling down to the most vulnerable of our population.

NW Natural believes that prior year vintage allowances should be introduced as soon as possible to allow regulated entities the opportunity to comply with the program. The release of these prior vintage allowances is intended to align the project trajectory with the program goals, delaying introduction of these allowances continues to perpetuate the disconnect between the original program trajectory and the corrected December 31st deadline.

Thank you for considering our comments. If you have any questions, please reach out to me at kellye.dundon@nwnatural.com.

Sincerely,

Kellye Dundon
Environmental Policy Manager
NW Natural