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## Comment

To: Department of Ecology  
From: Chris Roden, Director of Energy Resources  
Date: 5/15/2025  
Re: April 24, 2025, Cap-and-Invest Program Linkage Rulemaking

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Clatskanie People's Utility District ("CPUD") appreciates the opportunity to file comment on the Washington Department of Ecology's ("Ecology") April 24, 2025, Cap-and-Invest Program Linkage Rulemaking ("Linkage Rules").

As background, CPUD is a publicly owned utility located in Clatskanie, Oregon. We are a Slice/Block customer of the Bonneville Power Administration, and we provide electrical service to a single electrical customer located in Camas, Washington. The Washington customer is a registered EITE entity with Ecology.

CPUD supports the comments offered by the Georgia-Pacific Corporation (GP).

Additionally, CPUD requests Ecology consider the impacts of this rulemaking on CPUD and GP given the unique circumstances associated with serving this load relative to the CCA and ESSB 6058. CPUD serves EITE load in Washington which is harmed relative to other EITEs due to its inability to be mitigated through an allotment of allowances as broadly intended in the CCA. We believe this rulemaking goes further in creating disparate treatment of GP by asserting only "Washington" entities may participate in activities including auctions intended to alleviate the burden of the CCA. Our concern is that Washington EITE entity will again be held out of accessing allowances and allowance auctions because of the unique electrical service.

We recognize the challenges within a rulemaking of this complexity and magnitude. Our request is for Ecology to recognize this unique situation and work with us to put the EITE entity back on an even playing field.

Chris Roden  
Director of Energy Resources  
Clatskanie People's Utility District