

Comments of the Western Power Trading Forum on Ecology's draft Proposed Changes to the Climate Commitment Act Program Rules

May 16, 2025

The Western Power Trading Forum (WPTF) appreciates the opportunity to provide input to the Washington Department of Ecology (Ecology) on its draft proposed changes to the Climate Commitment Act Program rule under the Linkage Rule Making. Our comments below are limited to the changes currently proposed to the existing rule. We understand that a further iteration of the draft rule addressing additional elements will be released at a later date, and accordingly we will provide additional comments at that time.

Further Consideration is needed of treatment of unspecified Electricity Purchased from a Federal Power Marketing Administration

WPTF has concerns with the language proposed for paragraph 1(c)i of section 173-446-030 pertaining to unspecified electricity purchased from a federal power marketing administration:

- (c) A first jurisdictional deliverer that imports electricity into Washington, and ~~whose~~:
- (i) Whose cumulative annual total of covered emissions associated with ~~this the~~ imported electricity for any calendar year, ~~whether~~ from specified sources and qualifying unspecified electricity purchased from a federal power marketing administration or unspecified sources, equal or exceed 25,000 metric tons of carbon dioxide equivalent per year. Qualifying unspecified electricity purchased from a federal power marketing administration is electricity purchased pursuant to section 5(b) of the Pacific Northwest Electric Power Planning and Conservation Act of 1980, P.L. 96-501, that Ecology determines is not from a specified source;

As written, this paragraph is extremely confusing. It suggests that power purchased pursuant to section 5(b) can be unspecified. WPTF does not believe that this is currently the case, nor do we believe that is should be the case. Under the existing program rules, all power purchased directly from the Bonneville Power Administration (BPA) is considered specified Asset Controlling Supplier (ACS) electricity. Thus, as WPTF sees it, all power purchased pursuant to section 5(b) of the Pacific Northwest Electric Power Planning and Conservation Act of 1980, P.L. 96-501) is specified ACS power. It is possible for an entity to purchase unspecified electricity from BPA, for instance when an entity purchases electricity at the Mid-C tracing hub via the Intercontinental Exchange (ICE). However, in this scenario, the entire purchase is considered unspecified. Thus, as drafted, this language does not make sense.

WPTF understands that the SB6058 language regarding the section 5(b) purchases was included to address concerns about the possibility that these purchases could be considered unspecified in the future. To address this concern, we recommend that Ecology simply establish in the rule that all power purchases pursuant to section 5(b) are considered specified ACS electricity, as follows.

Whose cumulative annual total of covered emissions associated with ~~this the~~ imported electricity for any calendar year, ~~whether~~ from specified sources or unspecified sources, equal or exceed 25,000 metric tons of carbon dioxide equivalent per year. All electricity purchased from a federal power marketing administration pursuant to section 5(b) of the Pacific Northwest Electric Power Planning and Conservation Act of 1980, P.L. 96-501 is considered specified electricity.

Additional clarity is needed for voluntary opt-in registration by a Federal Power Marketing Administration

WPTF supports the addition of provisions in new section 173-446-054 addressing the process for BPA to opt-in to the CCA as a covered entity. However, we note that while RCW 70A.65.090 paragraph (3) establishes requirements for how opt-in entities leave the program, these requirements are not reflected in the program rule. We request that Ecology include language in section 173-446-050 to clarify how opt-in entities can leave the program.

Further, in paragraph (4) Ecology should clarify that the reference to “a covered or opt-in entity refers to entities other than BPA.

**Comments of the Western Power Trading Forum on Ecology's draft Proposed Changes to the
Greenhouse Gas Reporting Rule**

May 16, 2025

The Western Power Trading Forum (WPTF) appreciates the opportunity to provide input to the Washington Department of Ecology (Ecology) on its draft proposed changes to the Greenhouse Gas Reporting Rule under the Linkage Rule Making. WPTF does not offer substantive comments on the proposed changes at this point in time. Instead we will wait for more Ecology to elaborate more extensive language changes to give effect to the electricity provisions under SB6058 and to address imports via centralized electricity markets. In this regard, we note that Ecology has revised the definition of "Imported Electricity" and added a definition of "Electricity Wheeled Through the state" to mirror the provisions of SB6058. Because the corresponding SB6058 provisions direct Ecology to develop further guidance through rulemaking, simply restating those provisions in the rule does not provide any additional clarity for Electricity Power Entities. We suspect that these revisions to the definitions are intended temporarily as placeholders until Ecology develops more detailed rule language that reflects Ecology's assessment of electricity that is legitimately wheeled through the state or separately accounted for. Once that more detailed rule language is developed, the definitions should be replaced.