



AWEC

Alliance of Western Energy Consumers ♦ 201 Ferry Street, SE, Suite. 200 ♦ Salem, OR 97301 ♦ AWEC.solutions

February 20, 2026

Via Electronic Filing

Washington Department of Ecology
300 Desmond Drive, SE
Lacey, WA 98503

Re: Cap-and-Invest Program Updates and Linkage Rulemaking

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to file these comments on the Washington Department of Ecology’s (“Ecology”) February 5, 2026 Request for Feedback on Centralized Electricity Markets and Electricity Imports (“Request”).

On September 5, 2025, AWEC previously submitted comments in this rulemaking. As noted in those comments, AWEC is a non-profit trade association of large energy consumers in the Western United States, including many of Washington State’s largest businesses and employers. These businesses are in a variety of industries, including agriculture, aeronautics, air products, pulp and paper, food processing, information technology, healthcare, and more. AWEC represents the energy interests of these members in a number of forums, including the Utilities and Transportation Commission and other state administrative agencies, the Bonneville Power Administration, and the Washington Legislature.

AWEC wishes to reemphasize its September 5, 2025 comments and highlight the issue raised by Georgia-Pacific LLC (“GP”) in its series of comments related to covered entity status for imports of specified and unspecified electricity. AWEC continues to agree with GP’s analysis of the Climate Commitment Act, which establishes different and distinct coverage thresholds for imports of specified and unspecified power. Ecology’s paramount obligation in this rulemaking is to faithfully implement the Legislature’s intent in passing the CCA, which is first and foremost identified by the plain and unambiguous words of the law. AWEC encourages Ecology to revise its rules to reflect this intent, as GP’s series of comments articulates; or, if Ecology disagrees with GP, it should provide the basis for its reading of the law.

AWEC looks forward to further engagement with Ecology related to these issues.

Sincerely,

William (Bill) A. Gaines
Executive Director, AWEC