

**Comments of the Western Power Trading Forum
on the Department of Ecology's
Proposed Rule Changes for Electricity Imports**

May 20, 2026

The Western Power Trading Forum (WPTF) appreciates the opportunity to provide input to the Washington Department of Ecology (Ecology) on its proposed amendments to the Greenhouse Gas Reporting rule under the Climate Commitment Act (CCA) to address electricity imports. WPTF generally supports Ecology's proposed changes. Our comments below are limited to areas where we propose additional areas to be addressed and areas where our recommendations are substantively different than the proposed amendments.

Additional Areas that should be addressed in the amendments

Ecology should address reporting for electricity imports sourced from California

WPTF is optimistic that Washington's cap-and-invest program will be linked to that of California and Quebec as of January 1, 2027. While most of the changes necessary to give effect to this linkage will be addressed in the cap-and-invest program rules, the reporting rule must also address treatment of electricity transactions between Washington and California¹.

Specifically, we recommend that Ecology include new provisions that require reporting entities to identify imported electricity sourced from California. Additionally, the calculation of emissions for electricity imports, including those via a centralized electricity markets, should be modified to provide that electricity imported from California resources is not assigned an emission obligation.

Ecology should add a placeholder for Energy Storage

As we stated in our February comments, growing demand for clean energy is driving rapid development of energy storage throughout the west. Within Washington we expect this demand to come not only from retail providers who are preparing to meet Clean Energy Transformation Act (CETA) requirements, but also from large energy users, such as data center operators, who are looking to meet their own clean energy targets.

During the May 5th workshop, Ecology staff indicated their intention that imports from storage resources would not be exempt from reporting, despite the lack of rules for such imports in the proposed amendments. Depending on how storage resources are charged, there may be emissions associated with imported electricity that passes through storage. Ignoring these imports and any associated emissions would create emissions leakage and potentially impair

¹ Linkage of the California and Quebec programs did not necessitate changes to the electricity reporting rules because these jurisdictions do not share a common electricity system.

linkage. However, without addition of provisions that enable imported electricity that pass-through storage to be specified, we fear that these imports will be assigned the default emission rate. Such an outcome would disincentive imports from storage, making it more difficult for Washington to achieve its climate and clean energy goals, and unnecessarily increasing costs for Washington ratepayers, because it would inflate emissions attributed to these imports.

For this reason, we urge Ecology to develop regulatory provisions for electricity imports from energy storage as soon as possible. However, we understand the position of some stakeholders who are supportive of including provisions to address imports from energy storage systems, but are reluctant for Ecology to adopt the provisions proposed by the California Air Resources Board (CARB) without an opportunity for discussion. While we believe that the proposal by CARB for registration of energy storage resources and assignment of a specified emission factor is a reasonable and flexible approach, we support a further stakeholder process.

We therefore suggest that in the short-term, Ecology include a simplified definition of energy storage systems, that established the principle that imports from storage may be considered specified, provided that those imports comply with Ecology rules to be developed:

“Energy storage systems” or “ESSs”: A device, structure, or operation designed and used to store electric potential from electric power that discharges electric power as imports into Washington. All ESS, unless registered with a reported and verified emissions factor are not specified sources. Electricity imported from an ESS may be considered a specified source of electricity, if registered and approved in accordance with rules adopted by the department of Ecology.

Once the current rulemaking is finished, Ecology should convene a stakeholder process to consider imports from energy storage.

Ecology should add definitions of committed capacity and surplus electricity

Both the Extended Day Ahead Market (EDAM) and Markets+ design features to accommodate the two state cap-and-invest programs rely in part on the concept of energy that is committed to load within those states to minimize emissions leakage. Although the Markets+ tariff requires that the load verify the existence of a contract for ‘Type 1A’ imports (those that must be attributed to Washington), neither market tariff requires documentation or verification of contracts as a condition for attribution of other specified imports. Markets+ additionally uses the concept of ‘surplus’ electricity in its design and allows the entity that offers surplus electricity (Type 2) to self-indicate its ‘surplus threshold’ MW.

If the Department of Ecology does not define these concepts in its regulation², it will have no means of enforcing the intended market designs. An entity could simply indicate in its market offer that it has a contract with Washington load, or that all of the entity's offered specified energy was surplus, and the market would attribute that energy to Washington if it is economic to do. Without Ecology oversight, this could result in the same emissions leakage that the market design features are intended to minimize. Ecology should therefore plan to adopt provisions to give effect to the 'committed capacity' and 'surplus electricity' concepts used in the market designs, prior to Washington retail providers joining the day-ahead markets.

Comments on Calculation Methods for electric power entities

Provision of data by balancing authorities (BAs): Ecology has added a requirement for BAs operating in Washington to share data with Ecology to support verification of imports and analysis of transactions. Staff indicate that the requirement will also support data necessary to enable mapping and publication of POR/PODs located in Washington.

WPTF does not oppose this addition but believes that both the data to verify bilateral import transactions, and that needed to develop and maintain an accurate mapping of Washington POR/PODs could be more efficiently provided by Open Access Technology International (OATI). If contracting with OATI to obtain this data is not feasible, then WPTF recommends that Ecology limit the data required from BAs to that necessary to identify tagged import transactions and the responsible importer, and Washington POR/PODs at which an import/export can occur, or that corresponds to a Washington source or sink.

Definitions

- **Electricity importer:** Sub-paragraph (f)(v) of this definition refers to the scenario where the Bonneville Power Administration (BPA) would otherwise be the importer for a bilateral import to Washington, but has not elected to take on compliance obligations under the Climate Commitment Act. The proposed language change adds a reference to new sub-paragraph (xi), which addresses electricity scheduled to a discrete load within a balancing authority area (BAA) operated by a multijurisdictional retail provider (MJRP), but that is not served by that MJRP. We believe that the additional reference in f(v) is intended to address load of preference customers of BPA located within an MJRP's BAA.

² We note that CARB's proposed amendments add a new definition of 'committed capacity' intended to provide the legal basis for the EDAM design features to reduce emissions leakage: "'Committed capacity' means electricity generation from an electricity generation source located outside the state of California that is committed via a contract to serve California load and is registered with the CAISO pursuant to section 33.32.2.3 of the CAISO Fifth Replacement Tariff dated May 1, 2026."

However, new sub-paragraph (xi) is intended to identify the gap identified in the Electricity Imports White Paper of a load located within a MJRP that is served by other wholesale market participants³.

WPTF recommends that Ecology strike the reference to sub-paragraph (xi) in (f)(v), and instead add a new sub-paragraph to address BPA customer load located within a MJRP BAA. This new paragraph should define the load as the electricity importer, if BPA has not elected to take on the compliance obligation.

We also recommend that Ecology reflect its intention to develop guidance on the pro-rata attributions, referenced in sub-paragraphs (xii) and (xiii) in those definitions.

- **Exported Electricity:** WPTF notes that Markets+⁴ is developing market rules to ensure that electricity from Washington resources that is committed to load outside the state is not included in the volume of electricity considered to serve Washington load. This will ensure that the quantity of electricity attributed to Washington, and the market's marginal GHG price is accurate.

WPTF recommends that Ecology expand the definition of exported electricity to include this electricity so that reporting of exported electricity aligns with the centralized market allocations:

"Exported electricity" means electricity generated inside Washington state and delivered or allocated by a centralized electricity market to serve load located outside Washington state...

- **Common Point:** WPTF supports addition of the new definition of common point. However, we do not consider sub-paragraph (ii) (" a POR/POD that is both located fully within Washington state and a multistate-state balancing authority area, but is not associated with the multi-state balancing area's common system power pool") to be appropriate.

Under the framework laid out in the White Paper, and endorsed by Ecology, electricity that sinks to a multistate BAA, including that operated by an MJRP, is not considered an import to Washington. Rather, imports to Washington by tagged transactions out of the BAA to a Washington sink, by the MJRP emission calculation for that entity's Washington

³ Kaiser Aluminum was cited as the example in the White Paper.

⁴ CAISO may also address this issue in the future.

load, or by a centralized market attribution to a Washington sink. The sole exception to this general rule is sink PODs in an MJRP's BAA not served by the MJRP (e.g. the Kaiser Aluminum example in the White Paper.) However, WPTF cannot imagine a scenario where electricity would ever be wheeled through sink PODs associated with discrete loads in an MJRP. Ecology should therefore delete sub-paragraph (ii).

Data Requirements and calculation methods

Reporting of wheel-throughs: Paragraph 3(c) addressed reporting of electricity wheeled-through the state. We support the modifications to this paragraph, with the exception of the language “unless the linked jurisdiction has adopted rules accounting for electricity imports wheeled into and out of Washington on separate e-tags.” We oppose the inclusion of this language for two reasons. First, we do not read SB6058 as providing Ecology with discretion to ignore this provision.

Second, while we recognize that exclusion of wheel-throughs on separate e-tags from the definition of imported electricity could inadvertently result in missed emissions if the export leg sinks in California, we do not believe that nullification of the wheel is the appropriate solution. The concern arises if an entity imports unspecified electricity to Washington, and exports unspecified electricity to California in the same hour. Under an approach whereby California, once linked, does not assign an emissions obligation to any electricity imported from Washington, the emissions associated with the original transaction would be missed. This is obvious in comparison to a scenario where instead of wheeling through Washington to California, the entity simply imports unspecified energy to California.

In WPTF's view, the correct way to ensure that emissions associated with electricity wheeled-through Washington on separate e-tags and sunk in California would be for California to require importers to report any electricity that originated in Washington and to identify any electricity imports associated with a wheel-through in Washington. This would enable California to assign a carbon obligation to those imports and would ensure that those costs are appropriately borne by California load, not Washington.

Composite source accounting: WPTF supports the new section on composite source accounting, as it generally aligns with the approach laid out in the Electricity Imports White Paper and recent WPTF comments. However, we oppose the requirement that the reporting entity to be able to claim the generation source as specified source of electricity.

We believe that the intent of this paragraph is to meet the standard in subparagraph (A) regarding the portion of electricity delivered that is “unambiguously shown to be supported by Washington generation sources”. Requiring the importer to have a specified source claim to the resource(s) would certainly meet that standard. However, that requirement is too narrow.

Because specified electricity transacts at a premium, market participants typically do not contract for specified electricity unless they have need for the associated attributes or the emission factor of the underlying resource. If the market participant simply needs energy to meet its load obligations, it will contract for unspecified energy. Even electricity contracted under ‘hubbing’ arrangements with the Mid-C Public Utility Districts may provide unspecified energy from the Washington utility’s generating *system*, rather than a particular resource. The entity doing composite source accounting should still be expected to demonstrate unambiguously that the electricity was supported by Washington generation sources, but this can be achieved through showing of a contract for energy from a Washington utility system, and the e-tags.

For this reason, WPTF requests that Ecology add “or system” after “Washington generation sources” in sub-paragraph (A), and delete sub-paragraphs (B), and (E)(II).