

## Georgia-Pacific LLC (Brandon Wood)

Georgia-Pacific LLC ("GP") 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"). The Request seeks comment on several topics related to the treatment of energy transacted through centralized electricity markets and electricity imported into Washington under the Climate Commitment Act ("CCA") as Ecology continues to finalize rules to implement recent changes to the CCA and help facilitate linkage with other cap-and-trade jurisdictions ("Linkage Rules").

In two prior comment periods in this rulemaking, GP has identified and detailed a specific concern it has with how Ecology proposes to treat compliance for electricity imports under the current iteration of its Linkage Rules. Specifically, GP has demonstrated that the CCA establishes different compliance thresholds for imports of specified (25,000 metric tons of carbon dioxide equivalent ("MT/CO<sub>2</sub>e")) and unspecified (0 MT/CO<sub>2</sub>e) power, respectively, and that surpassing the threshold for imports of unspecified power does not alone trigger a compliance obligation associated with specified power imports. GP also demonstrated that this interpretation of the CCA is consistent with how other jurisdictions with which Washington seeks to link, namely California, establish compliance obligations for specified and unspecified power.

Nevertheless, Ecology's Request does not seek feedback on this issue or otherwise address it. Accordingly, GP continues to request that Ecology modify its rules to clarify the distinct compliance thresholds applicable to specified and unspecified electricity imports. In the event Ecology does not modify the Linkage Rules, GP reiterates its request that Ecology provide the reasoning underlying its understanding that a compliance obligation for emissions associated with imports of specified electricity under 25,000 MT/CO<sub>2</sub>e exists when the same entity imports unspecified electricity with associated emissions above 0 MT/CO<sub>2</sub>e.

GP appreciates Ecology's continued efforts in this rulemaking and is happy to meet with Ecology representatives to further discuss the concerns it has raised with the Linkage Rules at Ecology's convenience.

February 20, 2026

**Brandon Wood**  
Manager, Energy Supply***Via Electronic Filing***Washington Department of Ecology  
300 Desmond Drive, SE  
Lacey, WA 98503***Re: Cap-and-Invest Program Updates and Linkage Rulemaking***

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In two prior comment periods in this rulemaking, GP has identified and detailed a specific concern it has with how Ecology proposes to treat compliance for electricity imports under the current iteration of its Linkage Rules.<sup>1</sup> Specifically, GP has demonstrated that the CCA establishes different compliance thresholds for imports of specified (25,000 metric tons of carbon dioxide equivalent (“MT/CO<sub>2</sub>e”)) and unspecified (0 MT/CO<sub>2</sub>e) power, respectively, and that surpassing the threshold for imports of unspecified power does not alone trigger a compliance obligation associated with specified power imports.<sup>2</sup> GP also demonstrated that this interpretation of the CCA is consistent with how other jurisdictions with which Washington seeks to link, namely California, establish compliance obligations for specified and unspecified power.<sup>3</sup>

Nevertheless, Ecology’s Request does not seek feedback on this issue or otherwise address it. Accordingly, GP continues to request that Ecology modify its rules to clarify the distinct compliance thresholds applicable to specified and unspecified electricity imports. In the event Ecology does not modify the Linkage Rules, GP reiterates its request that Ecology provide the reasoning underlying its understanding that a compliance obligation for emissions associated with imports of specified electricity under 25,000 MT/CO<sub>2</sub>e exists when the same entity imports unspecified electricity with associated emissions above 0 MT/CO<sub>2</sub>e.

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<sup>1</sup> [GP Comments re Cap-and-Invest Program Updates and Linkage Rulemaking Comments \(May 16, 2025\)](#) (“GP Round 1 Comments”); [GP Comments re Cap-and-Invest Program Rule Updates and Linkage Rulemaking Comments \(Sept. 5, 2025\)](#) (“GP Round 2 Comments”).

<sup>2</sup> GP Round 1 Comments at 3-5.

<sup>3</sup> *Id.* at 5-6.

GP appreciates Ecology's continued efforts in this rulemaking and is happy to meet with Ecology representatives to further discuss the concerns it has raised with the Linkage Rules at Ecology's convenience.