

Blake Scherer

Benton PUD fully supports the comments submitted by both The Energy Authority (TEA) and Snohomish PUD regarding Ecology's decision to retroactively collect allowances from utilities by reducing future allocations. In alignment with TEA and Snohomish PUD, Benton PUD is concerned that such retroactive adjustments will directly harm our ratepayers.

Benton PUD urges Ecology to treat the 2023 and 2024 vintage allowance allocations as final allocations. These allowances have already been deposited into electric utility accounts and should not be subject to retroactive adjustment. Allocation adjustments should apply only to initial allocations—that is, future allocations not yet deposited—where adjustments can be reasonably made based on updated load forecasts or Ecology methodology changes. Retroactive changes should not be used to "correct" past allocations that were already finalized.

Blake Scherer

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Benton PUD authorized representative for cap-and-invest and greenhouse gas reporting