

Avista (John Rothlin) Anonymous Anonymous

I want to thank Ecology staff for their work on this rule. I want to just point to a couple of things and that has to do with what we think is the unnecessary stringency on the book and claim accounting for renewable natural gas and the use of renewable energy credits to lower carbon intensity for electricity.

They don't we don't believe serve a public policy purpose for clean fuel program and we will be submitting written comments along with other gas and electric fuel providers to that effect.

But I did want to highlight just one point with regard to the carbon intensity reduction method using renewable energy credits and the limitation it requires that it be facilities built after 2019 and only in Washington, Oregon and Idaho. And I don't think it's as important as when the facility is built as it is when the renewable energy credit was generated.

Utilities don't typically just build a renewable facility to meet new load. We have a lot of other tools available to us including non wire solutions such as energy efficiency and demand response and these are different ways and more cost effective ways to meet new load and and achieve just the same amount of reduced emissions.

Furthermore, the limitation on Oregon, Washington and Idaho geography is doesn't align with the physics of the grid. We are interconnected across the West.

Avista and other utilities have and are building renewable energy systems in Western Montana, for example, which is directly intertwined with the balancing area that Avista serves and the rest of the of the utility system in the West.

We think renewable energy credits certified within the REGIS system, which is the system by which Washington utilities generate, transact and retire RECs would qualify, should qualify for reducing the carbon intensity for electricity.

So thanks for the opportunity to comment today.