



May 6, 2026

Re: Kaiser Aluminum Comments on Draft Washington-California-Québec Linkage Agreement

Thank you for the opportunity to comment on the Draft Washington-California-Québec Linkage Agreement. Kaiser Aluminum appreciates Ecology's efforts to stabilize compliance costs under the Climate Commitment Act while reducing greenhouse gas emissions in Washington.

In the early years of the Climate Commitment Act, one of the significant challenges for regulated parties has been the high and fluctuating cost of auctioned allowances. Long-term investments in facilities and jobs in Washington require a stable allowance market and predictable compliance costs. Kaiser supports linkage of the Washington market to the combined California and Québec market to stabilize allowance prices and improve the predictability of entities' compliance costs.

Any linkage of the Washington market to the combined California and Québec market must maintain the statutory treatment of emissions-intensive, trade-exposed entities (EITEs) in Washington. Linkage to the larger combined market should not negatively affect EITEs' compliance pathway. Instead, as Ecology works out the details of linking the markets, it should look for opportunities to support EITEs' long-term investment and growth in Washington. Kaiser respectfully asks Ecology to engage all stakeholders, including the EITE community, as it negotiates the details of linkage implementation.

Kaiser continues to welcome any opportunity to work with Ecology to review the Climate Commitment Act's performance and impact on industries in Washington. Kaiser encourages Ecology to maintain a meaningful dialogue with regulated parties and to facilitate an ongoing public process as it implements linkage with California and Québec.

The Climate Commitment Act is driving public and private investment in greenhouse gas emissions reductions. Kaiser appreciates efforts to stabilize the Climate Commitment Act's allowance market and looks forward to working with Ecology to identify program improvements that encourage EITEs to responsibly invest and expand in Washington.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent Downey", written over a large, light blue circular stamp or watermark.

Brent Downey

Director of Corporate Environmental Engineering
Kaiser Aluminum