KAISER ALUMINUM

July 21, 2026

Surabhi Subedi
Department of Ecology, Climate Pollution Reduction Program
PO Box 47600
Olympia Washington 98504-7600

Re: Cap-and-Invest Program Updates and Linkage Rulemaking

Thank you for the opportunity to comment on the Cap-and-Invest Program Updates and Linkage Rulemaking. Kaiser Aluminum appreciates Ecology's efforts to stabilize compliance costs under the Climate Commitment Act by linking Washington's allowance market with the combined California-Quebec market. The Climate Commitment Act is further driving public and private investment in greenhouse gas emissions reductions, and Kaiser looks forward to working with Ecology and other stakeholders to support the program's success.

Long-term investments in facilities and jobs in Washington require a stable allowance market, predictable administrative processes, and long-term feasible compliance options. We are hopeful this linkage rulemaking will achieve the first two of these important objectives. First, Kaiser supports a linked market that stabilizes the price of allowances for all Washington covered entities. Second, Ecology should ensure this rulemaking encompasses all changes necessary to effectuate linkage. Since the Climate Commitment Act's market was established in 2023, the program has faced almost continuous regulatory updates. This rulemaking is another example, introducing new compliance period terms, registration and corporate association updates, and other administrative clarifications. Every administrative change requires covered entities to invest time and money in understanding the changes and ensuring internal processes are consistent. This rulemaking should reflect the final administrative changes necessary to allow Washington's covered entities to predictably and efficiently engage in the larger linked market.

Ecology should next turn its attention and resources to the critical third objective: long-term and feasible compliance pathways are available to entities that want to responsibly invest and grow in Washington. Linkage should not negatively affect the compliance pathways for emissions-intensive, trade-exposed entities (EITEs). Instead, a stabilizing market and predictable administrative processes should serve as a foundation for stakeholders to work together to develop compliance pathways that support feasible long-term investment and growth in Washington.

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 respectfully asks Ecology to engage all stakeholders, including the EITE community, as it finalizes the details of linkage implementation and turns its focus to developing long-term compliance pathways for Washington EITEs.

Sincerely,

Brent Downey
Director of Corporate Environmental Engineering