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July 21, 2026

Surabhi Subedi, Rulemaking Lead
Washington Department of Ecology
300 Desmond Dr SE
Lacey, WA 98503
Submitted via https://ecology.commentinput.com/?id=frD53sZtA

RE: 3Degrees comments in Response to Proposed Rule Language for Chapters 173-441 and 173-446 WAC – Cap-and-Invest Program Updates and Linkage

Dear Surabhi Subedi and Cap-and-Invest team,

3Degrees Group, Inc. ("3Degrees") appreciates this opportunity to provide comments to the Washington Department of Ecology ("Ecology") in response to the proposed rules for WAC 173-441 and 173-446 to implement the Cap-and-Invest Program and Linkage.

3Degrees is a provider of renewable energy and carbon mitigation products, programs, and services. To this end, 3Degrees supports hundreds of corporate and institutional customers in meeting carbon reduction and renewable targets. 3Degrees is also a leading carbon project developer working with dozens of emissions reductions projects in various sectors to produce high-quality carbon credits.

We offer the following comments in response to the proposed regulation published on June 1, 2026.

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3Degrees supports the ongoing replenishment of allowances for the voluntary renewable electricity reserve account.

3Degrees strongly supports the proposed change in WAC 173-446-245 to replenish the voluntary renewable electricity reserve account on an ongoing basis. Replenishment of the reserve account protects the emissions reduction benefits that the voluntary renewable electricity (VRE) market provides for the state. Without the necessary set-aside of these allowances, there would be no cost-effective mechanism to ensure that VRE purchases are counted towards statewide emissions reductions. The proposed language underscores the importance of this mechanism by guaranteeing that 0.33% of yearly allowances be set aside for this purpose. 3Degrees recommends that this allocation be periodically reviewed through the mechanism of future rulemakings, in order to ensure the level continues to appropriately match the size of the voluntary market in the state. 3Degrees applauds Ecology for recognizing the contribution of voluntary renewable electricity to the state's goals and providing clear language for the level of matching allowances the voluntary market can expect going forward.

3Degrees appreciates this opportunity to provide feedback and we look forward to continuing to work with Ecology on the implementation of the Cap-and-Invest Program. Please reach out with any questions or for further discussion.

Sincerely,

/s/ Theresa Keith

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