Comments by James Adcock on UE-210183 Utilities Proposed "Integrated Joint Utility and Financial Accounting Concept"
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Comments on Utilities Proposed "Integrated Joint Utility and Financial Accounting Concept"

Comments by James Adcock, Electrical Engineer, MIT

The Concept of 80% "real" non-emitting energy verses merely 20% "stripped RECs and alternative compliance" is a fundamental feature of the law. Any proposal which does not make clear what and why energy and RECs qualify for the 80% verses merely qualify for the 20% of the law should be seen for what it is: a jaundiced attempt to defeat the clear language and requirements of the law.

Utilities propose using an "accounting period" of one entire year -- in comparison in-actual-practice electricity is commonly bought and sold between entities on an hourly basis, or even on a 15-minute basis.

Utilities make this "Year-long Accounting Period" proposal because they want to defeat the clear stated requirements of the law that non-emitting electricity actually be used to serve customers load, and that only 20% of load can be met with alternative compliance methods including unbundled RECs. Utilities' proposal basically changes these requirements to say that 100% of load can be met with alternative compliance methods if those methods are unbundled RECs.

Here's an example of how, under Utilities proposed rule, they can defeat the clear intent of the law:

Say in some hour a utility generates and/or buys non-emitting energy in excess of their load in that hour. They strip the RECs off that excess energy and sell it as "unspecified sale" of energy to Californian utilities (say) via the Mid-C market. Under their proposal they retain the RECs and then retire them claiming those RECs qualify under the 80% part of the law, not just the 20% of the law.

Clearly the utility did not "use" that excess energy to serve their load or for that matter any Washington State load. Rather it was used to serve Californian load – that is to whom they sold the energy. Yet Utilities claim under this their proposal that they can cover up to 100% of their retail load using such "Excess Non-emitting energy / Stripped RECs" -- which came from that now-Californian energy.

I suggest on the contrary that such "Stripped RECs" can only be used to meet the 20% part of the law. Otherwise the 80% vs. 20% definitions in the law become meaningless.

Please reject Utilities Joint proposal for what is clearly is: merely the latest attempt in a long string of attempts to defeat the clearly stated requirements of the law.

James Adcock