



JOINT WORKSHOP AND DISCUSSION
with the Washington State Department of Commerce
and the Washington Utilities and Transportation Commission regarding the
double counting of Renewable Energy Credits ([RCW 19.405.030](#) and [19.405.130](#))
September 27, 2021, starting at 1 p.m.
Hosted via online webinar, details below

Summary

The Washington State Department of Commerce (Commerce) and Washington Utilities and Transportation Commission (Commission) are developing rules implementing certain sections for the Clean Energy Transformation Act (CETA)¹ centered on the implementation of [Chapter 19.405 RCW](#). Commerce filed its CR-101 as WSR 194-14-050. The Commission filed its CR-101 under Docket UE-210183. Comments were filed to the docket pursuant to Commerce and the Commission’s notice issued on May 17, 2021. This workshop allows Commerce, the Commission, and interested stakeholder to further explore the topic of double counting in a collaborative environment.

Background

CETA requires that Washington utilities provide electricity starting in 2030 that is greenhouse gas neutral. Under that standard, a utility may use fossil-fired sources for up to 20% of its supply if it offsets this use with unbundled renewable energy credits (RECs) or other alternative compliance options.

However, unbundled RECs may be used for this purpose only if “there is no double counting of any nonpower attributes associated with renewable energy credits within Washington or programs in other jurisdictions.”² The Legislature directed Commerce and the UTC to adopt rules “to address the prohibition on double counting of nonpower attributes under RCW 19.405.040(1) that could occur under other programs.”³

¹ Chapter 19.405 RCW.

² [RCW 19.405.040](#)(1)(b)(ii). Relevant definitions are included below.

³ [RCW 19.405.130](#)(3).

Double counting is most frequently raised as a concern where electricity from a renewable generator is sold as a specified, zero emission resource for delivery to a jurisdiction that caps greenhouse gas emissions, such as California, and the associated unbundled RECs are transferred to Washington utilities for use in compliance with CETA. The workshop will explore various views about whether double counting exists in this situation and, if so, what requirements Washington might adopt to prevent use of unbundled RECs that would otherwise be double counted.

Webinar Instructions

This is a webinar-only meeting. Parties may participate by telephone, but participation by computer will make it easier to facilitate the discussion.

Link: <https://wastatecommerce.zoom.us/j/87318563056?pwd=SXRXandSdzlDQ2lYYzJwRC9mNzBqUT09>

Password: Energy

Join by phone: (253) 215-8782; meeting ID: 873 1856 3056 passcode: * 814514

Agenda

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| 1. Scope and process for the workshop | 1:00 – 1:10 |
| Glenn Blackmon, Manager, Energy Office Policy, Commerce | |
| 2. Commissioner remarks and introductions | 1:10 – 1:20 |
| 3. Imported Electricity in California’s Cap-and-Trade Program | 1:20 – 1:50 |
| Ryan Schauland & Abajh Singh, California Air Resources Board | |
| a. Questions | 1:50 – 2:10 |
| 4. Break | 2:10 – 2:20 |
| 5. Group 1 discussion of double counting | 2:20 – 2:35 |
| Glenn Blackmon | |
| Clare Breidenich, Western Power Trading Forum | |
| Lisa Gafken, Public Counsel | |
| a. Questions from the Commissioners and UTC staff | 2:35 – 2:45 |
| 6. Group 2 discussion of double counting | 2:45 – 3:00 |
| Glenn Blackmon | |
| Vlad Gutman-Britten, Climate Solutions | |
| Katie Ware, Renewable Northwest | |
| Electric Utility representatives | |
| a. Questions from the Commissioners and UTC staff | 3:00 – 3:10 |
| 7. Public comment | 3:10 – 3:45 |
| 8. Next Steps | 3:45 – 4:00 |
| Glenn Blackmon | |
| Commissioners and UTC staff | |

Commerce and the Commission are committed to providing reasonable accommodations to participants with disabilities at its facilities. If you need a reasonable accommodation for this workshop, please contact the Commission at least one business day prior to the workshop by calling 1-360-664-1132 or by sending an email to human_resources@utc.wa.gov. For TTY service, please call the Washington Relay Service at 7-1-1 or 1-800-833-6384.

If you have questions regarding the workshop or this rulemaking, please contact use the contact information below:

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Relevant definitions from [RCW 19.405.020](#):

"Nonpower attributes" means all environmentally related characteristics, exclusive of energy, capacity reliability, and other electrical power service attributes, that are associated with the generation of electricity, including but not limited to the facility's fuel type, geographic location, vintage, qualification as a renewable resource, and avoided emissions of pollutants to the air, soil, or water, and avoided emissions of carbon dioxide and other greenhouse gases.

"Renewable energy credit" means a tradable certificate of proof of one megawatt-hour of a renewable resource. The certificate includes all of the nonpower attributes associated with that one megawatt-hour of electricity and the certificate is verified by a renewable energy credit tracking system selected by the department.

"Unbundled renewable energy credit" means a renewable energy credit that is sold, delivered, or purchased separately from electricity.