



September 20, 2021

**VIA ELECTRONIC FILING**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Glenn Blackmon  
Manager, Energy Policy Office  
Washington Department of Commerce  
1011 Plum Street SE  
Olympia, WA 98504

**RE: Utilities and Transportation Commission, Docket UE-210183  
Department of Commerce, CETA "Use" Rulemaking**

Dear Mr. Johnson and Dr. Blackmon,

The Public Generating Pool (PGP) would like to submit two studies for the record in Docket UE-210183 and Commerce's 2021 CETA rulemaking process, as follows: (1) "Western Flexibility Assessment," December 2019 and (2) "State-Led Market Options Study", Stakeholder meeting presentation, June, 2021.

PGP represents eleven consumer-owned utilities that own and operate generating resources. Collectively, PGP's members serve approximately 1.5 million customers, purchase approximately 45% of Bonneville Power Administration's preference power, and own almost 8,000 megawatts of predominantly carbon-free generation.

PGP supported the passage of the Clean Energy Transformation Act as passed by the 2019 Legislature. Our support was based on the careful balance of interests included in the statutory language. Key to our support was the inclusion of a multiyear compliance framework to manage the variability of hydropower generation and other renewable resources. And, we prioritize an approach to implementation of CETA that will support and not limit or distort the efficient operation of wholesale electricity markets.

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In particular, please note slides 46 and 47 of the “Western Flexibility Assessment” indicating cost estimates related to high integration scenarios in which utilities are participating in markets and limited coordination scenarios where wholesale market participation is reduced. This study shows that emissions increase with limited trading across the West and clean energy goals cannot be met without markets.

And, in the “State-Led Market Option Study,” please note slide 24, showing the financial benefits by state of participation in a Regional Transmission Organization (RTO).

Please contact me if you have any further questions at [thampton@publicgeneratingpool.com](mailto:thampton@publicgeneratingpool.com) or 360-852-7366.

Thank you,

A handwritten signature in cursive script, appearing to read "Therese Hampton".

Therese Hampton, Executive Director

Atts: “Western Flexibility Assessment” and “State-Led Market Option Study”