Exh. JDW-29 Dockets UE-240006/UG-240007

Witness: John D. Wilson

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKETS UE-240006 & UG-240007 (Consolidated)

Complainant,

v.

AVISTA CORPORATION,

Respondent.

EXHIBIT TO

CROSS-ANSWERING TESTIMONY OF

JOHN D. WILSON

ON BEHALF OF STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Ecology Auction, December 2023

August 16, 2024



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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Washington Cap-and-Invest Program Auction #4 December 2023 Summary Report

Issued on December 13, 2023

Background

Ecology held an auction of allowances on December 6, 2023. The auction included the sale of year 2023 current vintage and year 2026 future vintage allowances. Auction #4 included allowances that were consigned by entities.

Prior to today's certification of Auction #4, Ecology staff and the independent market monitor evaluated bids and determined that the auction process and procedures complied with the requirements of the Washington Regulation. The Market Monitor made the following determination:

The Market Monitor found that the auction was cleared consistent with the auction clearing rules in the regulation and appropriate economic logic. The Market Monitor confirmed the clearing price and clearing quantities by qualified bidder. The auction algorithm correctly applied requirements of the regulation covering the bid guarantee. The Market Monitor did not observe any breaches of communication protocols.

The Market Monitor recommends Ecology approve the December 2023 Auction results.

The Financial Services Administrator will distribute auction proceeds to the State of Washington and to consigning entities after all qualified bidder payments are received. Ecology will release information on January 4, 2024, in the Auction Public Proceeds Report, providing the final amount of proceeds generated from Auction #4.

Auction Results

All allowances offered for sale by Ecology were sold. The settlement price for current vintage allowances was \$51.89 per allowance. The settlement price for future vintage allowances was \$45.00 per allowance.

Table 1: Qualified Bid Statistics for Auction #4 December 2023

| Auction Statistics | Current Auction | Advance Auction |
|---------------------|-----------------|-----------------|
| Auction Floor Price | \$22.20 | \$22.20 |
| Settlement Price | \$51.89 | \$45.00 |

Table 2: Allowances offered for sale in Auction #4 December 2023

| Description of Allowances | Current Auction Vintage 2023 total | Advance Auction Vintage 2026 total |
|---|------------------------------------|------------------------------------|
| Allowances offered by Washington entity consignment | 3,699,891 | None |
| Allowances offered by Ecology | 3,442,255 | 2,449,760 |
| Total allowances offered for sale | 7,142,146 | 2,449,760 |

Table 3: Allowances sold in Auction #4 December 2023

| Description of Allowances | Current Auction Vintage 2023 Total | Advance Auction Vintage 2026 total |
|---|---------------------------------------|---------------------------------------|
| Allowances sold for Washington entity consignment | 3,699,891 | None |
| Allowances sold by Ecology | 3,442,255 | 2,449,760 |
| Total allowances sold at auction | 7,142,146 | 2,449,760 |

Table 4: Auction Data for Auction #4 December 2023

| Auction Data | Current Auction | Advance Auction |
|---|-----------------|-----------------|
| Total qualified bids divided by total allowances available for sale | 1.48 | 1.66 |
| Proportion of allowances purchased by compliance entities | 87.0% | 69.2% |
| Herfindahl-Hirschman Index* | 592 | 692 |

^{*}Herfindahl-Hirschman Index (HHI) is a measure of market concentration and competitiveness, the values of which range from 0 to 10,000. A lower HHI value indicates a higher level of competition. A higher HHI value indicates greater market concentration among fewer entities.

List of qualified bidders for Auction #4 December 2023

A qualified bidder is an entity that completed an auction application, submitted a bid guarantee that was accepted by the Financial Services Administrator, and was approved by Ecology to participate in the auction. Qualified bidders may or may not have participated in the auction.

This list includes 55 qualified bidders.

| CITSS Entity ID | Entity Legal Name |
|-----------------|--------------------------------------|
| WA3591 | Avista Corporation |
| WA3446 | BP PRODUCTS NORTH AMERICA INC. |
| WA3556 | Braeswood Climate Partners, LP |
| WA3462 | Cardinal Glass Industries |
| WA3530 | Cascade Natural Gas Corporation |
| WA3549 | CenTrio Energy Seattle, LLC |
| WA3545 | CHEVRON U.S.A. INC. |
| WA3621 | CHS Inc. |
| WA3568 | City of Enumclaw |
| WA3636 | CityServiceValcon, LLC |
| WA3544 | Coleman Oil Company, LLC |
| WA3626 | Colvin Oil I LLC |
| WA3557 | Constellation Energy Generation, LLC |
| WA3468 | CP Energy Marketing (US) Inc |
| WA3744 | DRW Investments LLC |
| WA3685 | DTE Energy Trading, Inc. |
| WA3528 | East Coast Environmental, LLC |
| WA3558 | Elbow River Marketing Ltd. |
| WA3479 | GAS TRANSMISSION NORTHWEST LLC |
| WA3669 | General Petroleum |
| WA3457 | Grays Harbor Energy LLC |
| WA3519 | HF Sinclair Puget Sound Refining LLC |
| WA3760 | HP Carbon, LLC |
| WA3488 | Idemitsu Apollo Corporation |
| WA3569 | J.Aron & Company LLC |
| WA3579 | Macquarie Energy LLC |
| WA3435 | MARATHON PETROLEUM COMPANY LP |
| WA3590 | Midstream Energy Partners (USA), LLC |
| WA3536 | Morgan Stanley Capital Group Inc. |
| WA3472 | Musket Corporation |
| WA3442 | MV Global Carbon Fund LP |
| WA3565 | NGL Supply Co. Ltd. |
| WA3496 | NORTHWEST PIPELINE LLC |
| WA3477 | Nucor Steel Seattle, Inc. |
| WA3502 | NW Natural Gas Co. |
| WA3470 | Oregon Carbon Holdings, LLC |

| CITSS Entity ID | Entity Legal Name |
|-----------------|--|
| WA3683 | Pacific Summit Energy LLC |
| WA3487 | PacifiCorp |
| WA3600 | Petrogas, Inc. |
| WA3424 | Phillips 66 Company |
| WA3575 | Portland General Electric Company |
| WA3475 | Powerex Corp. |
| WA3438 | Puget Sound Energy, Inc. |
| WA3662 | SeaPort Sound Terminal, LLC |
| WA3474 | Shell Energy North America (US), L.P. |
| WA3416 | Trafigura Trading LLC |
| WA3483 | Trailstone Commodity Trading US, LLC |
| WA3570 | TRANSALTA ENERGY MARKETING (U.S.) INC. |
| WA3417 | Triolith Energy Fund, LP |
| WA3469 | Tyson Foods, Inc. |
| WA3481 | U.S. OIL & REFINING CO. |
| WA3509 | Vitol Inc. |
| WA3527 | Washington State University |
| WA3706 | West Coast Environmental, LLC |
| WA3454 | Wilson Oil Inc |

How does Ecology decide what information to share?

Ecology shares information about the outcome of each quarterly auction as required by the Washington regulation and to support the successful implementation of the program. Ecology does not share information that could potentially enable market manipulation or other unfair practices by market participants.

Contact Information

If you have questions about the information in this auction summary, please contact:

Website: ecology.wa.gov/auctions-and-market

Email: RegistrarCCA@ecy.wa.gov

Ecology CCA Help Desk: 360-407-6296

ADA Accessibility

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