
From: Kelly Hall <kelly.hall@climatesolutions.org>
Sent: Monday, May 4, 2020 4:46 PM
To: Rector, Andrew (UTC) <andrew.rector@utc.wa.gov>
Subject: Annual average retail electric load in EIA rules

Hi Andrew,

Climate Solutions did not submit comments on the EIA rules, but I did want to flag one issue that I noticed regarding the use of “average annual retail electric load” in WAC 480-109-200 (10). While the EIA has an annual renewable energy compliance obligation, the language in CETA relieves the utility of that renewable compliance obligation if a utility has met 100% of its “average annual retail electric load” using renewable energy, RECs, or nonemitting generation.

There is a conflict here because the CETA compliance obligation is based on four-year average loads, but the EIA is based on the utility’s annual load over the previous two years. Given that the “average annual retail electric load” is never defined in statute nor rules, there needs to be some clarification in rule so that a utility is not relieved of their annual compliance obligation until the end of the four-year CETA compliance period.

Happy to talk through this on the phone, but it’s something I wanted to flag.

Best,

Kelly