

From: [Rector, Andrew \(UTC\)](#)
To: [UTC DL Records Center](#)
Subject: FW: EIA rules - unknown sources and REC acquisition date
Date: Monday, July 20, 2020 5:23:42 PM
Attachments: [image001.png](#)
[image002.png](#)

Hello – Can you please post the below message in the UE-190652 docket? Thanks.

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From: Blackmon, Glenn (COM) <glenn.blackmon@commerce.wa.gov>
Sent: Tuesday, May 5, 2020 5:31 PM
To: Rector, Andrew (UTC) <andrew.rector@utc.wa.gov>
Subject: EIA rules - unknown sources and REC acquisition date

Hi, Andrew,

I wanted to run a couple of questions/observations by you about about the proposed EIA rule amendments. I've included them below.

Thanks,
Glenn

1. Is unknown generation the same as unspecified electricity? It appears to be, since the emissions rate for unspecified electricity is applied to it. Electricity can be unspecified even if the source is known, by separating the RECs from the electricity. For this reason as well as for consistency with the statutes, it might be better to update the term to “unspecified electricity.”

~~((3))~~ **(4) Unknown generation sources.** For resources where the utility purchases energy from unknown generation sources, ~~((often called "spot market" purchases,))~~ from which the emission rates are unknown, the utility ~~((shall report emission metrics using the average electric power CO₂ emissions rate described as the net system mix (spot market) in the Washington state electric utility fuel mix disclosure reports compiled by the department pursuant to RCW 19.29A.080))~~ must use an emissions rate determined by the department of ecology. If the department of ecology has not adopted an emissions rate for unspecified electricity, a utility must apply an emissions rate of 0.437 metric tons of CO₂ per megawatt-hour of electricity. For the resources described in this subsection, a utility must show in the report required in subsection (1) of this section the following:

2. The provision requiring that all RECs be acquired by the start of the target year is not one applied to the consumer-owned utilities. Nor is it required by the statute. What's the objective of this requirement? How is that interpreted with respect to RECs that are otherwise eligible and created after Jan. 1 of the target year?

average load for the remainder of each target year.

(2) **Credit eligibility.** (~~Renewable energy credits produced during the target year, the preceding year or the subsequent year may be used to comply with this annual renewable resource requirement provided that they were acquired by January 1st of the target year.~~) A qualifying utility may use renewable energy credits to meet the provisions of this section, provided the renewable energy credits meet the following requirements:

(a) Renewable energy credits were acquired by January 1st of the target year;