

10/20/20 12:21

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Issue 4: Double-Counting and Sales of Electricity

1. Topic 1 – Defining the issue
 - a. What is double-counting?
 - i. Emissions?
 - ii. Electricity?
 - iii. Non-power attributes?
 - iv. The interaction of those?
 - b. Why is double-counting an important issue? What should policy in this space address and prevent?
 - c. Where are potential risks for double-counting likely? Within Washington? When transacting with other jurisdictions?
 - d. Do underlying sales of electricity result in double-counting of one of the elements in question 1a?
 - i. Does it matter if the sale is resource-specific? Whether the sale is bundled/unbundled?
2. Topic 2 – CETA Specific Issues
 - a. What double counting does CETA prohibit?
 - i. CETA explicitly prohibits double-counting of non-power attributes (RCW 19.405.040(1)(b)(ii)), but does it also imply a prohibition for double-counting of other commodities -- electricity, emissions or anything else?
 - ii. Are double-counting restrictions different under RCW 19.405.040(1) and RCW 19.405.050(1)?
 - b. Is matching of RECs and load required to address double-counting? What are the pros and cons of requiring/not requiring matching? Pros and cons of different levels of granularity of a potential matching requirement?
 - i. Hourly?
 - ii. Interannual?
 - iii. Etc?
3. Topic 3 – Implementation Requirements
 - a. What kinds of documents can be used or developed to document non-emitting attribute ownership?
 - i. Commercial data—documents of contracts and transactions?
 - ii. Operational—etags, etc?
 - iii. Existing compliance requirements—FERC Form 1?
 - iv. Other?