

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

RULEMAKING TO IMPLEMENT
REVISIONS TO GREENHOUSE GASES
EMISSIONS PERFORMANCE
STATUTE – RCW 80.80.060

DOCKET NO. UE-100865

COMMENTS OF PUBLIC COUNSEL

July 26, 2010

- I.* Public Counsel supports the Commission’s intent to file a proposed rule (CR 102) incorporating discussion draft rules WAC 480-100-425(1)(b) and (3). It is reasonable and appropriate to include “extraordinary cost impacts on utility ratepayers” as a possible basis for granting an exemption to the GHG requirements. The list of supporting information required for an application will help insure that on a case-by-case basis the exemption is properly justified.