Issue 4: Double-Counting and Sales of Electricity

1. Topic 1 – Defining the issue
   1. What is double-counting?
      1. Emissions?
      2. Electricity?
      3. Non-power attributes?
      4. The interaction of those?
   2. Why is double-counting an important issue? What should policy in this space address and prevent?
   3. Where are potential risks for double-counting likely? Within Washington? When transacting with other jurisdictions?
   4. Do underlying sales of electricity result in double-counting of one of the elements in question 1a?
      1. Does it matter if the sale is resource-specific? Whether the sale is bundled/unbundled?
2. Topic 2 – CETA Specific Issues
   1. What double counting does CETA prohibit?
      1. 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?
      2. Are double-counting restrictions different under RCW 19.405.040(1) and RCW 19.405.050(1)?
   2. 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?
      1. Hourly?
      2. Interannual?
      3. Etc?
3. Topic 3 – Implementation Requirements
   1. What kinds of documents can be used or developed to document non-emitting attribute ownership?
      1. Commercial data—documents of contracts and transactions?
      2. Operational—etags, etc?
      3. Existing compliance requirements–FERC Form 1?
      4. Other?