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?