

Comments by James Adcock on UE-191023 Responding to UTC Questions of June 12 2020.

Docket number of this proceeding: UE-191023

Commenting party's name: James Adcock, Electrical Engineer

The title and date of the comment or comments:

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James Adcock

5005 155th PL SE

Bellevue WA 98006

jimad@msn.com

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket UE-191023 James Adcock Responding to UTC Questions of June 12 2020

I read RCW 19.405.040(1)(a) as stating that Lawmakers wanted actual, real, verifiable, generation of renewables and non-emitting power, and that no other approaches can be substituted.

I believe Lawmakers, correctly, were gravely concerned that combining RECs with unrelated power could easily allow manipulation of sources and amounts of pollution, such that the end result *did not* in fact result in "zero net emissions."

Further, they may have well-understood that while a REC is a reasonable "compromise" in a voluntary market, but that it makes absolutely no sense in a mandatory situation, as CETA sets up. What does "null power" mean in a CETA world? It doesn't make any sense at all. There are simply sources of power which emit, and those which do not. Another way of saying this in a CETA world is that all non-emitting sources have to inherently have their RECs and other environmental attributes firmly bound to them and "retired" immediately. Nothing else makes any rational sense.

I understand that after some decades of having voluntary markets saying this is going to feel uncomfortable to many people, regulators, environmentalists, and utilities alike, but it still remains: non-emitting means non-emitting, emitting means emitting, and if in theory you were to move a REC from one to the other, in order for the CO2e accounting to work out, one would simply have to move an *exactly identical* amount of CO2e from the emitting generation to the non-emitting generation. Not some kind of average -- but rather an *exactly identical* amount of CO2e for that particular MWh of emitting generation to the non-emitting generation. It is because utilities do not want to admit this exact shifting of emitted CO2e from one source to the other that they do not want to accept that RECs no longer make sense "unbundled."

1. I agree with Staff's interpretation. It is correct.
2. a. Yes this information and supporting documentation must be required, and be made publicly available after a short amount of elapsed time, say three months, in order to be publicly vetted.
- b. I don't believe the fuel mix disclosure by itself is publicly verifiable, and I think we do need to get to publicly verifiable, lest "disasters" happen that will taint both utilities and those charged with regulating them. The temptation is simply too great for some utility to "cheat" on the system.
- c. I don't believe attestation will work, and I think we do need to get to publicly verifiable, lest "disasters" happen that will taint both utilities and those charged with regulating them. The temptation is simply too great for some utility to "cheat" on the system.
- d. Again, I suggest that to avoid "cheating" in practice we need the actual tags recorded as in 2.a. above, and in addition after a small set amount of time we need that information made publicly available without restrictions, for purpose of public vetting.

Thank you for your consideration,

James Adcock