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Comments by James Adcock on Docket UE-210628 6-10-22
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Avista imagines CETA as merely a fictitious system of internal "baseball card trading" – or perhaps more modernly as a system of NFT trading of little digital tokens with cartoon pictures of monkey faces on them. In Avista's fantasy no real action is required of them under CETA – merely because they hold a minority of their ratepayers in another state. When imagining Avista's fantasy increasing Washington State's portion of the baseball cards increases the "leakage" of GHG out of Washington State and into its afflicted neighboring states. It is not the intent of CETA to allow such "leakage" into our neighbors, nor to allow such merely fantastical "fake" improvements in GHG emissions.

Imagine if Avista's ratepayers were entirely in Washington State. By Avista's own accounting in 2020 they were at 74% "clean" – if the entirety of this 74% were used to serve Avista customer load. CETA requires them then to get to 80% – an increase of 6% – or an easily accomplishable increase of 0.6 percent per year as follows – following the typical "prudent" linear glidepath:

2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
74	74.6	75.2	75.8	76.4	77	77.6	78.2	78.8	79.4	80

But, only about 2/3 [approximately] of Avista's business resides in Washington State, so the actual proper analysis would only require them to accomplish the 2/3 of the goal associated with Washington State. 2/3 of 6% is simply 4% as follows:

2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
74	74.4	74.8	75.2	75.6	76	76.4	76.8	77.2	77.6	78

UTC should require Avista to actually – not fantastically – acquire these numbers – to actually modestly increase the "clean" energy generated by their entire company by 4% linearly over the current decade. Since in each of these years those modest percentages [74 to 78 percent] do represent a "Government Mandate" by the government of Washington State, then any associated RECs – by whatever name you choose to call them – must be immediately retired to avoid a "Double Counting Scheme". IE the 74% to 78% [of total generation] RECs associated with Avista's "clean" generation must be retired during these years as being associated with CETA. We know this is a "Government Mandate" because CETA actually requires the funding to reach these percentages from the Avista ratepayers in Washington State. Both Washington State and Federal EPA agree that RECs associated with any "Government Mandate" must be immediately retired, and may not be sold to any other "suckered" REC purchasers. The reason is very simple: any such "RECs" [if they were not retired] are not "incremental" – the purchase of such RECs by any other entity does not actually cause any more Renewable Energy to be generated – because such Renewable Energy generation is already mandated by CETA and Washington State. Such fake "RECs" result in no new additional incremental generation, and no new additional reduction in GHG. "What goes around comes around" – if Washington State were to allow the generation of these fake RECs, then we can certainly expect other states to also permit the generation of fake RECs – which our other utilities would then purchase to avoid making real GHG reductions – thus destroying the clear intent of CETA to make real GHG reductions.

In addition to the 74% to 78% retirement mentioned above, if Avista were to take no other action CETA requires the remaining "20%" to be covered by the retirement of additional RECs. Reducing that 20% by the [roughly] 2/3 Washington component, results in an additional 13% of [Avista total] REC retirement in the 2020 to 2030 years.

To further clarify, CETA allows for no cost-containment cap prior to 2030, instead requiring that a utility Shall get to 80% by 2030.

Please require Avista to actually gradually modestly increase their renewable generation on a company-wide basis from 74% to 78% on a linear glidepath over the next decade, and to actually immediately retire the RECs associated with that 74% to 78% –plus the additional 13% REC retirement if Avista takes no other action to cover the CETA "20%"

Thank you for your consideration,

James Adcock, Electrical Engineer, MIT