

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

In the matter of the  Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act Rulemaking	DOCKET NO. UE-191023  COMMENTS OF TYR ENERGY, INC.
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Tyr Energy, Inc. (“Tyr Energy”) appreciates this opportunity to submit comments on the Washington Utilities and Transportation Commission (the “Commission” or “WUTC”) rulemaking regarding Clean Energy Implementation Plans and compliance with the Clean Energy Transformation Act (“CETA”). These comments respond to the Commission’s Notice of Opportunity to File Written Comments issued January 15, 2020 (the “Notice”).

Tyr Energy is an investor in and developer of North American independent power projects. Tyr Energy is an owner, managing member, and operator of the 275MW natural gas-fired, combined-cycle, Lancaster power generation facility that is located just east of Spokane, across the Idaho border. (This project is also sometimes referred to as the Rathdrum facility, though not to be confused with the 175MW “Rathdrum” facility owned and operated by Avista Corporation (“Avista”).) The Lancaster facility sells capacity and energy to Avista pursuant to a contract through September 2026. Avista serves electric customers in Idaho as well as Washington.

As Tyr Energy is not subject to the Commission’s regulatory authority, we will not respond to many questions posed in the Notice. Tyr will, however, comment on resource adequacy and may have additional comments at a later phase of this proceeding.

The Washington Legislature recognized that the transition to clean energy must “not impair the reliability of the electricity system.” RCW 19.405.010(2). The Legislature properly recognized that utilities have “resource adequacy requirements.” RCW 19.405.060 and .090. In the Commission’s Notice, the first question posed is a question relating to resource adequacy and system reliability.

Tyr Energy agrees that resource adequacy is of primary importance. We believe that the Lancaster facility has an important role to play in ensuring resource adequacy for Avista and, more broadly, for the region. There is a lot of uncertainty as to how system reliability will be protected in the shift from fossil-fueled baseload and dispatchable resources to more intermittent resources. Each utility will have to respond in a different way to changes in the regional resource portfolio. It will be important for utilities to have flexibility in developing plans to address resource adequacy and securing resources to meet resource adequacy requirements, over the near-, mid- and long-term.

Tyr Energy also believes that consumers will benefit if utilities that serve in more than one state have appropriate flexibility to use resources in each state that align with that state’s policy goals and directives.

Tyr Energy greatly appreciates the Commission’s consideration of its views.

Dated this 27th day of February 2020.

Respectfully submitted,

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