

**From:** [David Turnoy](#)  
**To:** [Records Management \(UTC\)](#)  
**Subject:** Comment on Docket UE-210183  
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External Email

Executive Director and Secretary Amanda Maxwell,

Thank you for the opportunity to provide comment on Docket UE-210183, Relating to Electricity Markets and Compliance with the Clean Energy Transformation Act. When the Clean Energy Transformation Act (CETA) became law in 2019, it established the foundation for Washington's transition to a clean energy future. The rulemaking currently in process is fundamental to the successful implementation of CETA's core mandates. I am writing to urge the UTC to uphold the law's strong, clear requirements to achieve a fossil fuel-free electricity grid by ensuring that all electricity delivered to Washington customers is from nonemitting sources by 2045.

Washington is already experiencing the impacts of climate change in the form of ocean acidification, sea level rise, and the increasing severity, frequency, and duration of wildfires, heat waves, and extreme weather events. These impacts disproportionately affect Tribal nations and Black, Indigenous, and other overburdened communities. CETA's requirements for utilities to transition to 100% nonemitting electricity generation is one of our state's most important policies to date aimed at curtailing our greenhouse gas emissions and preventing escalating and irreversible harm to our state's communities, ecosystems, and economy.

The draft rule released by the UTC on October 12, 2021 fails to require the clean energy that CETA mandates and would allow utilities to use fossil fuel-generated electricity in Washington past 2045, with no end date in sight. This is clearly inconsistent with CETA and must be revised in order to comply with the statute. Specifically, the draft rule must be revised to eliminate the use of "retained Renewable Energy Credits" and other provisions that would allow utilities to simply offset the continued use of fossil fuel-generated electricity, rather than providing 100% of electricity delivered to WA customers from nonemitting sources.

Ensuring that Washington keeps its commitment to 100% clean and nonemitting electricity generation will not only eliminate greenhouse gas emissions from power generation, it will also help drive the large-scale investments in clean energy we need to help transition our entire economy away from fossil fuels. Burning fossil fuels for electricity and heat is the largest source of greenhouse gas emissions worldwide. Our state has provided a blueprint to the nation and the world, showing it's possible to make a just transition to a 100% clean electricity future. Thank you for your consideration and for your work to faithfully implement CETA.

Sincerely,  
David Turnoy  
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