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November 7, 2019

Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Washington Department of Commerce
1011 Plum Street SE
Olympia, WA 98504

Docket UE-190760

RE: Nominations and Educational Topics for Carbon and Electricity Markets Stakeholder Work Group

The Public Generating Pool (PGP) appreciates the Washington Utilities and Transportation Commission (Commission) and the Washington Department of Commerce (Commerce) initiation of the Carbon and Electricity Markets Stakeholder Work Group (Workgroup). PGP believes the education and findings of this Workgroup are important to ensuring utilities can use least-cost solutions to implement the policy objectives of the Clean Energy Transformation Act (CETA) through participation in existing and future carbon and electricity markets.

PGP would like to nominate the following members to the Workgroup to serve as consumer-owned utility representatives:

- Melissa Lyons from Chelan County PUD;
- Josh Walter from Seattle City Light; and
- Therese Hampton from Public Generating Pool.

In the October 24th Workgroup meeting agenda, the Commission and Commerce proposed the following subjects for the Workgroup meetings:

- Educational sessions;
- Identification of problem statement(s); and
- Work toward identifying principles, findings, and recommendations.

PGP supports this approach and believes it is important that the Workgroup first establish a common understanding of existing markets and electric system operations. With that foundation, the connection points between CETA and these markets can be identified and areas of commonality and conflict can be captured. This will help shape the next step of defining any problem statements and developing principles and recommendations for addressing the conflicts.

PGP recommends that the process begin with educational session(s) on the topics identified in the table below. PGP believes it is important that the education sessions be led by regulatory or responsible entities in the field, if possible, rather than Workgroup participants.

TOPIC	POTENTIAL PRESENTER
Generation resource attribute accounting and associated markets	<ul style="list-style-type: none"> • Western Renewable Energy Generation Information System • California and Oregon RPS Program Administrators
Generation emissions accounting and associated markets	<ul style="list-style-type: none"> • California Air Resources Board • Regional Greenhouse Gas Initiative • Western Climate Initiative, Inc
Power contracting and accounting	<ul style="list-style-type: none"> • Energy GPS
Power system real-time dispatch	<ul style="list-style-type: none"> • California ISO • Energy GPS

Again, we appreciate the willingness of your agencies to start this workgroup during a time when there are multiple CETA implementation demands and requirements. It is our belief that this workgroup will be helpful in informing and benefitting other important implementation efforts.

Sincerely,



Therese Hampton, Executive Director
Public Generating Pool