



May 10, 2023

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: **Renewable Northwest's comments regarding the Commission-led workshop series on the Climate Commitment Act, Docket U-230161**

Dear Director Maxwell:

Renewable Northwest ("RNW") thanks the Washington Utilities and Transportation Commission ("the Commission") for this opportunity to comment in response to the Commission's April 10, 2023, Notice of Opportunity to File Written Comments on Climate Commitment Act ("CCA") Workplan and Future CCA Workshops. We echo support for the comments made by other parties on Docket U-230161, including the Northwest Energy Coalition ("NVEC") and Climate Solutions. In particular, we recommend addressing the following four concerns in upcoming CCA workshops, as reflected in these parties' comments. These concerns are also echoed by NVEC and Climate Solutions in Dockets UE-220770<sup>1</sup>, UE-220789<sup>2</sup>, and UE-220797<sup>3</sup>:

- 1. Integration of allowance prices into investor-owned utility ("IOU") planning and resource dispatch**
- 2. Improved alignment of Integrated Resource Plan and Clean Energy Implementation Plan approval timelines with the timeline for IOU allowance allocation**
- 3. The use of consigned allowances to benefit utility customers**

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<sup>1</sup> Petition of Avista Corporation d/b/a Avista Utilities for an Order Approving Its Four-Year Demand and Resource Supply Forecast Pursuant to the Climate Commitment Act.

<sup>2</sup> Docket UE-220789, PacifiCorp's d/b/a Pacific Power & Light Company Petition Requesting Approval of Forecasts Pursuant to RCW 70A.65.120.

<sup>3</sup> Petition of Puget Sound Energy, Inc., for an Order Approving PSE's Forecasts Pursuant to RCW 70A.65.120.

**4. Emissions leakage (especially with regards to Colstrip reallocation), associated risks, and mitigation pathways**

Additionally, we would like to understand what actions the Commission plans to take as a result of this CCA workshop series. RNW supports NWECC's proposed timeline on Docket U-230161 to incorporate staff recommendations and iterative stakeholder review into future CCA workshop agendas. This would ensure future workshops are efficient and result in tangible outcomes for the final action plan.

Respectfully submitted,

A handwritten signature in cursive script that reads "Kate Brouns".

Kate Brouns  
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*Renewable Northwest*  
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