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Comments by James Adcock on UE-191023 and UE-190698 Part VIII--Planning

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Commenting party's name: James Adcock, Electrical Engineer

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I wish to express three concerns about possible ambiguities in the proposed planning rules, which might encourage utilities to mistakenly take liberties incompatible with the text of the CETA law.

First, WAC 480-100-610 (2) states that a utility must be GHG neutral by 1/1/2030, but does not state the second part of the CETA requirements, namely that the utility must also be 80% non-emitting by 1/1/2030 -- because the CETA law states this requirement explicitly.

I worry that a utility might mistakenly read this section as saying that they are not actually required to meet the explicitly state CETA 2030 goals -- that a utility is required to be 80% non-emitting by 1/1/2030 -- and that therefor more than 20% of their emissions can be covered by RECs or other alternative compliance at and after 1/1/2030.

Please clarify that a utility must be 80% non-emitting by 1/1/2030 and that RECs or other alternative compliance cannot be used to meet any part of this 80% -- and further the utility prior to 2030 must effectively use these requirements as the target of their planning, and actively build or buy "linear glide path" from 2020 to 2030 to actually meet these goals. No blowing through 2030 without actually having done anything effectively -- or by only implementing half of the 2030 requirements!

Second, it still has not been clarified in the regulations what constitutes a real "Real REC' -- a REC which corresponds to Washington State CETA law and to Federal EPA regulations, verses possible "Fake RECs" -- double-counting RECs -- issued in states which incorrectly allow the issuance of RECs for renewable energy amounts required by regulatory mandate, and which do not require those RECs to be immediately be "retired" -- since those RECs were in fact used by the regulatory mandate. Such states are in practice "Freeloading / Freeriding" off the ratepayers of other states -- read: Washington State's ratepayers -- these states are asking us to pay for their regulatory mandates. Do not let this happen. Washington State residents need to pay for their regulatory mandates, and citizens of other states need to pay for their own regulatory mandates. Do not allow the use of RECs from states that allow issuance of RECs for renewable energy

amounts corresponding to regulatory mandates. Please clarify in the Planning rules that utilities can use none of the “Fake RECs.”

RECs have to be "real RECs" corresponding to CETA definition and federal EPA definition -- not "fake RECs" -- "RECs In Name Only" -- that might be issued in some double-counting-scheme state. If a state does not require retirement of "RECs" in amounts equal to renewable energy generated in response to regulatory mandates, or if it allows "RECs" to be issued for renewable energy being generated to meet regulatory mandates, then that is a "double counting state" and any RECs issued in that state are not actually "RECs" but rather are "RECs in name only."

Finally utilities must actually allow real actual public participation in the IRP process, including actually being allowed time to ask meaningful technical questions, and getting those technical question actually answered. What has been going on in the Puget Sound Energy IRP meetings in 2020 is beyond absurd, where Puget keeps acting to block question for getting asked, and if they do get asked they never get answered, while Puget keeps pretending that they have been answered. This is crazy. This is not the required "public participation." This is a massive insult to the citizen ratepayers of Washington State. When UTC does not fix these problems, UTC becomes complicit. “Where there is smoke there is fire.” The utility’s actions represent a cover-up effort for inappropriate modeling biases.

Thank you for your consideration,

James Adcock, Electrical Engineer