

June 4, 2021

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98504-7250

Glenn Blackmon, Ph.D.
Manager, Energy Policy Office
Washington Department of Commerce - State Energy Office
Olympia, WA
360 556-7888

Received
Records Management
06/04/21 16:28
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. Johnson and Dr. Blackmon:

Climate Solutions, Northwest Energy Coalition, Vashon Climate Action Group, and Renewable Northwest appreciate the thoughtful process reflected in the notices issued to date by the Utilities and Transportation Commission and Department of Commerce regarding rulemakings on compliance with RCW 19.405.040(1)(a). We write today as stakeholders in those rulemakings to propose an alternative process specific to the issue of compliance and “use” that we believe will provide an opportunity for stakeholders to achieve consensus on a joint recommendation.¹

Specifically, we first request that the schedule for the proposed rulemaking be modified such that draft rules are not developed for stakeholder feedback until September 2021, followed by a comment opportunity in late September.

Second, we request that the Commission and Department postpone their initial workshop and comment opportunity, currently scheduled for June 9 and June 14, respectively. Instead, we suggest that the Commission and the Department allow stakeholders to focus over the next few months on discussions outside of formal agency process. We would be pleased to jointly report to the Commission and the Department on the progress of these discussions at regular intervals to the extent such reporting might be helpful.

Third, we request that the Commission and Department hold informational workshops featuring outside expertise on issues relating to compliance with clean electricity standards and the delivery, use, tracking, and reporting of electricity. Such workshops could help stakeholders

¹ We have submitted this proposal simultaneously to the Commission and the Department and note that the relevant Commission docket is UE-210183.

achieve a common understanding of issues such as the robustness and technical feasibility of possible compliance mechanisms. We request that these workshops occur during the summer of 2021 to help inform our discussions and the potential development of comments and draft rules in fall 2021.

Again we appreciate the work that has gone into the development of the joint Commission-Department rulemaking process and hope that our proposal will help both to reduce the agency resources necessary to develop rules and to facilitate the development of more agreement among stakeholders.

Sincerely,

/s/ Vlad Gutman-Britten

/s/ Kelly Hall

Climate Solutions

/s/ Lauren McCloy

/s/ Joni Bosh

Northwest Energy Coalition

/s/ Kevin Jones

Vashon Climate Action Group

/s/ Max Greene

/s/ Sashwat Roy

Renewable Northwest