



## Department of Energy

Bonneville Power Administration  
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Washington Utilities and Transportation Commission  
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COMMISSION

**Re: Docket UE-191023, Comments of the Bonneville Power Administration to the UTC's CR-102 Proposed Draft Rules, Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act**

The Bonneville Power Administration (BPA) appreciates the opportunity to provide comments on the Washington Utilities and Transportation Commission's (UTC) CR-102 Proposed Draft Rules pertaining to the CEIP rulemaking. BPA markets power from 31 federal hydroelectric projects, one nuclear plant, and some other small nonfederal power plants and owns about 75 percent of the region's high voltage transmission. BPA is statutorily-required to serve over 130 preference customers in the region, 63 of which are consumer-owned utilities in Washington, and sells power to privately-owned utilities as well. Additionally, the Residential Exchange Program, enacted under the Pacific Northwest Electric Power Planning and Conservation Act, provides residential and small farm customers of investor-owned utilities in the region a form of access to low-cost Federal power. BPA understands this rulemaking may have implications for CETA compliance for BPA's preference customers and investor-owned utilities that may purchase power from BPA in Washington. BPA is providing comments on the proposed WAC 480-100-650 (3)(f).

BPA thanks the UTC for proposing an approach for WAC 480-100-650 (3)(f) that does not involve creating and retiring hydro RECs for the federal hydropower system prior to 2029 in order to meet investor-owned utilities' interim targets. However, BPA requests that the UTC extend that requirement date to January 1, 2030. January 1, 2030 is consistent with the statute and consistent with Washington Department of Commerce's (Commerce) treatment of the same issue for consumer-owned utilities. Moreover, as a federal agency, BPA is not subject to CETA and has federal statutory obligations to serve utilities in Oregon, Idaho, Montana, and a few in Nevada and California, as well as in Washington. As BPA prepares to address proposed resource and documentation requests to support wholesale power sales to Washington utilities, BPA must also consider the cost implications of these requests to customers in other states. Accordingly, BPA requests the UTC afford more time by extending the compliance date by which investor-owned utilities must retire federal hydropower RECs to January 1, 2030.

Commerce's CR-102 Proposed Draft Rules recognize that consumer-owned utilities do not need to retire RECs for renewable hydropower purchased from BPA prior to 2030 to meet interim targets. BPA urges the UTC to synchronize with Commerce's proposed rule and change the date in WAC 480-100-650 (3)(f) to January 1, 2030.

Suggested change to WAC 480-100-650 (3):

(f) Verification and documentation of the retirement of renewable energy credits for all electricity from renewable resources used to comply with the requirements of RCW 19.405.040, 19.405.050, a specific target, or an interim target; except for electricity purchased from Bonneville Power Administration, which may be used to comply with these requirements without a renewable energy credit until January 1, ~~2029~~2030, as long as the nonpower attributes of the renewable energy are tracked through contract language;

BPA continues to appreciate the hard work and dedication of the UTC staff in developing CETA rulemaking language, and appreciates the opportunity to provide comments during the development of this language. Please feel free to contact me at 503.230.4358 or Liz Klumpp at 360.943.0157 if you have any questions on these comments.

Thank you,



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