

**From:** [Kim Clark](#)  
**To:** [Records Management \(UTC\)](#)  
**Subject:** Comment on Docket UE-210183  
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External Email

Executive Director and Secretary Amanda Maxwell,

Thank you for the opportunity to provide comment on Docket UE-210183, Relating to Electricity Markets and Compliance with the Clean Energy Transformation Act. Legal Voice is a non-profit legal advocacy organization that uses high impact litigation and policy advocacy to advance gender justice in the Pacific Northwest. Among other things, we are concerned about the disproportionate impact that pollution and climate change have on women, people living with low incomes, other marginalized communities, and people living at the intersection of multiple forms of oppression.

As such, I am writing to urge the UTC to uphold the law's strong, clear requirements to achieve a fossil fuel-free electricity grid by ensuring that all electricity delivered to Washington customers is from non-emitting sources by 2045.

Washington is already experiencing the impacts of climate change. These impacts disproportionately affect Tribal nations and Black, Indigenous, and other overburdened communities.

The draft rule released by the UTC on October 12, 2021 fails to require the clean energy that CETA mandates. The draft rule must be revised to eliminate the use of "retained Renewable Energy Credits" and other provisions that would allow utilities to simply offset the continued use of fossil fuel-generated electricity.

Ensuring that Washington keeps its commitment to 100% clean and non-emitting electricity generation will not only eliminate greenhouse gas emissions from power generation, it will also help drive the large-scale investments in clean energy we need to help transition our entire economy away from fossil fuels. Burning fossil fuels for electricity and heat is the largest source of greenhouse gas emissions worldwide. Our state has provided a blueprint to the nation and the world, showing it's possible to make a just transition to a 100% clean electricity future. Thank you for your consideration and for your work to faithfully implement CETA.

Sincerely,  
Kim Clark  
907 Pine St  
Seattle, WA 98101