Executive Director and Secretary Amanda Maxwell,

This comment relates to Docket UE-210183, Relating to Electricity Markets and Compliance with the Clean Energy Transformation Act. When the Clean Energy Transformation Act (CETA) became law in 2019, it established the foundation for Washington’s transition to a clean energy future. The rulemaking currently in process is fundamental to the successful implementation of CETA’s core mandates. I 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.

The draft rule released by the UTC on October 12, 2021 fails to require the clean energy that CETA mandates and would allow utilities to use fossil fuel-generated electricity in Washington past 2045, with no end date in sight. This draft is inconsistent with CETA and must be revised if it is to comply with the statute. Specifically, the draft rule must be revised to eliminate the use of “retained Renewable Energy Credits” and other provisions that would allow utilities to offset the continued use of fossil fuel-generated electricity, rather than providing 100% of electricity delivered to WA customers from non-emitting sources.

CETA’s requirements for utilities to transition to 100% non-emitting electricity generation is an important policy to curtail pollutants and greenhouse gas emissions, and to prevent escalating and irreversible harm to our state’s and the country's citizens, ecosystems, and economy.

Ensuring that Washington keeps its commitment to 100% clean and non-emitting electricity generation will reduce greenhouse gas emissions from power generation and help drive investments in clean energy that are needed to transition our economy for future prosperity. Burning fossil fuels for electricity and heat is the largest source of greenhouse gas emissions worldwide.

Thank you for your consideration of this comment.

Sincerely,
Mark Weiss
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