

November 12, 2020

Mark L. Johnson **Executive Director and Secretary** Washington Utilities and Transportation Commission 6221 Woodland Square Loop SE Lacey, WA 98503

Re: Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act, Docket UE-191023, and In the Matter of Amending, Adopting, and Repealing WAC 480-100-238, Relating to Integrated Resource Planning, Docket UE-190698

Dear Mr. Johnson:

The NW Energy Coalition submits comments on and a redlined version of the draft final rules filed October 14th, 2020 in this docket, along with a legal memo titled <u>Legal interpretation of</u> the Clean Energy Transformation Act requirement to use the social cost of greenhouse gas emissions.

Cordially,

Joni Bosh **NW Energy Coalition** joni@nwenergy.org