



Northwest CHP Application Center

Combined Heat and Power for the states of
Alaska, Idaho, Montana, Oregon and Washington
in cooperation with the U.S. Department of Energy



February 26, 2007

To: Record Center and Nicholas Garcia, Utility and Transportation Commission

From: Dave Sjoding, Team Leader

Subject: Docket UE-061895 Rulemaking for Energy Independence Act

The following comments regarding the scope of the rulemaking are made for the record. Washington Administrative Rules for the Energy Independence Act are encouraged in two areas:

- a) Clarifying the definition of "high efficiency co-generation" in RCW 19.285.040 (1) (C) including an example of the calculation to derive system efficiency.

Reason for including in the rulemaking process: A clear understanding of what does and does not qualify as "high efficiency co-generation" will help project developers to know upfront what is the standard; and

- b) Clarification as to whether or not non-electricity based carbon credit revenue pathways such as methane reduction (for example, elimination of dairy manure lagoons) are included in the "non-power attributes" definition of RCW 19.285.030 (13) and (17).

Reason for inclusion in the rulemaking process: To ensure upfront clarity of which revenue streams are and are not included in for project developers

It is further recommended that specific steps be taken in these two areas, to ensure coordination with the Department of Community, Trade and Economic Development's rulemaking process for I-937.

cc: Elizabeth Klumpp, Senior Energy Policy Specialist, Department of Community, Trade and Economic development
Jay Gordon, Washington State Dairy Federation

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