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October 20, 2011

David Danner
Executive Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

RE: Support of the Center for Resource Solutions' comments on the Petition for a declaratory order regarding the extra credits for apprentice labor provision of RCW 19.285.0404(2)(h), Docket U-111663

Dear Executive Director Danner:

The Renewable Energy Markets Association (REMA) appreciates the opportunity to provide comments in support of the Center for Resource Solutions' (CRS) response to RCW 19.285.0404(2)(h), Docket U-111663.

REMA represents the collective interests of both for-profit and nonprofit organizations that sell or promote renewable energy products through voluntary markets, including renewable technology, renewable electricity, and renewable energy certificates (RECs), to individuals, companies and institutions throughout North America.

REMA issues its support of the comments submitted by CRS. We agree that the petition to bifurcate the apprentice labor credit, apply the multiplier towards Renewable Portfolio Standard (RPS) compliance, and sell the REC separately would result in a double counting of renewable energy attributes. This has the potential to not only create market confusion, but also to divert a significant revenue stream for renewable energy operators and project developers from Washington to the rest of the country: renewable energy generated in Washington state would no longer be eligible for Green-E standards and consumers would have to look elsewhere for these quality, certified RECs. We urge the Commission to carefully consider the impacts of REC bifurcation on the clean energy industry in Washington before approving this petition.

Again, REMA would like to thank the Washington Utilities and Transportation Commission for this opportunity to express our support of the Center for Resource Solutions' comments. Should any of the aforementioned comments raise questions or require clarification, please contact Joseph Seymour, REMA Policy and Governmental Affairs Coordinator, at jseymour@ttcorp.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Lieberman".

Josh Lieberman
General Manager
Renewable Energy Markets Association
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