



November 12, 2021

Amanda Maxwell  
Executive Director and Secretary  
621 Woodland Square Loop SE  
Lacey, WA 98503

*Re: Draft CETA Rules, Docket UE-210183*

Dear Amanda Maxwell:

Thank you for this opportunity to provide comment on the draft rule for implementation of the Clean Energy Transformation Act. The Northwest Energy Efficiency Council has been an active voice in the region for over twenty-five years, representing energy efficiency businesses and advocating for policy that promotes economic development while also improving the environment. We support the state's objective to decarbonize the economy and believe the Clean Energy Transformation Act, or CETA, is a key statute in supporting the state in achieving its carbon reduction goals. The overall objective of CETA is clear: to transform the electricity in the state of Washington to 100% carbon-free and clean energy by requiring utilities to transition to 100% clean electricity. NEEC is concerned that the UTC's draft rule implementing CETA fails to require the clean energy that CETA mandates. Instead, the UTC's proposal would allow utilities to use fossil fuel resources to serve Washington customers indefinitely. This draft rule is plainly inconsistent with CETA and we ask that the UTC revise it to comply with the statute.

Specifically, the UTC must revise its draft rule to eliminate the use of "retained Renewable Energy Credits (RECs)" – a term found nowhere in the statute nor in common usage. The UTC also must eliminate all other provisions of the draft rule that would allow a utility to rely on electricity that it has sold to meet its obligation to serve customers in Washington with clean energy. CETA means what it says: utilities must use clean energy to serve their Washington customers.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry Meade".

Kerry Meade  
Executive Director  
Northwest Energy Efficiency Council

Received  
Records Management  
11/10/21 15:04  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION