

From: [Summer Montacute](#)
To: [Records Management \(UTC\)](#)
Subject: Eliminate Use of RECs - November 11, 2021
Date: Thursday, November 11, 2021 6:03:04 PM

External Email

To Whom It May Concern,

I am writing with comments on proceedings docket number **UE-210183**.

The Washington Clean Energy Transformation Act, or CETA, requires utilities to transition to 100% clean energy by 2045. This transformative requirement is necessary to help prevent the worst impacts of climate change and the harm fossil fuel pollution inflicts on surrounding communities. The Utilities and Transportation Commission (UTC) must faithfully implement the letter and spirit of CETA's clean energy standards by requiring utilities to use clean energy to serve their Washington customers.

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 using "retained Renewable Energy Credits" - a term not found in Washington law.

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.

From catastrophic wildfires to extreme heat to intense storms, the impacts of climate change are already harming Washington. And the harm that fossil fuel pollution causes surrounding communities has long been well documented. CETA's clean energy requirement is essential to mitigating these harms. The UTC must revise its draft rule to give effect to CETA's clean energy requirements.

Thank you,

Summer Montacute

November 11, 2021

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