

Nov 12, 2021

Amanda Maxwell, Executive Director and Secretary

621 Woodland Square Loop SE

Lacey, WA 98503

Re: Draft CETA Rules, Docket UE-210183

Received  
Records Management  
11/12/21 08:35  
State OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

### **Meaning of the Word “Use”**

I support NWECC’s comments on the meaning of the word “use”. Seems like the law says utilities should “use” the power. Why allow buying out-of-state REC’s at all? I understand that the UTC might be trying to make compliance easier, but why? What room does the law allow for that?

You could take a different tact. How about requiring utilities reduce CO2 emissions in 2022 by 15%, and increase that by 15% every year? That would be in line with reducing GHG emissions in line with state, national, and global goals. Perhaps you have more of a mandate to order this compared to allowing out-of-state REC purchases.

### **Demand Flexibility**

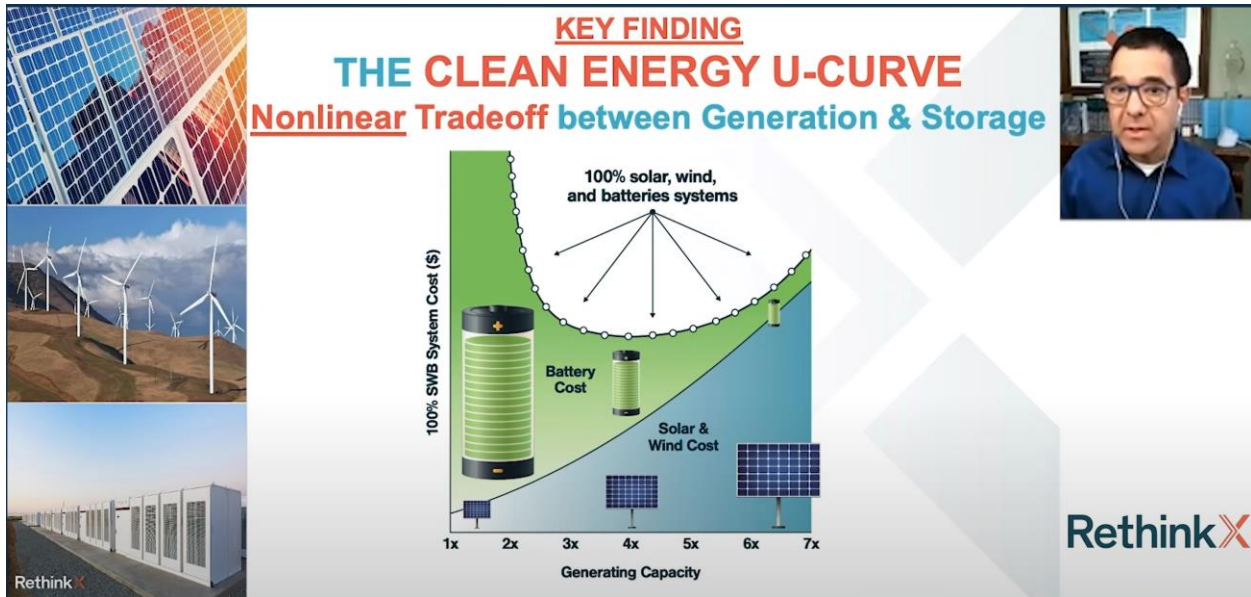
There are commercially available technologies to reduce the carbon intensity of the electricity in the grid, by shifting load to follow generation. Specifically, FlexCharging uses WattTime’s marginal CO2 emissions forecast to shift EV charging to the best time of the day, reducing emissions used to charge electric cars. This averages about 25% but could be even higher for some WA IOU’s with a dirty fuel mix.

Demand Flexibility provides a toolkit for lowering costs & emissions, with tech available **today**. Utilities have a strong role to play in establishing programs and marketing to consumers. It’s time to get started.

### **Super Power – 100% Solar, Wind & Batteries for all new capacity by 2030**

Commissioners, envision a better future, set high goals, and require plans that implement those goals. Demand compliance and a smooth pathway with measurable, *immediate and short-term* metrics for proving progress, including building solar, storage & creating Demand Flexibility programs in 2022, 2023, and 2024. If needed, require utilities to start the decade long process for new transmission, to support new wind & solar both in Eastern Washington and offshore. Don’t let up the pressure here – we are counting on our utilities to decarbonize faster than the rest of society, so we can electrify everything (including transportation & heating) and buy us time to address harder industrial processes like low-carbon steel or carbon-neutral jet fuel. Don’t water down the Legislature’s intent.

Let me share a better vision. Check out Tony Seba’s discussion of Super Power. He models that a 100% solar, wind and battery solution is the cheapest new capacity mix to build between now and 2030. He calls for over-building by 4x both for resource adequacy needs, and for tackling other sectors cheaply.

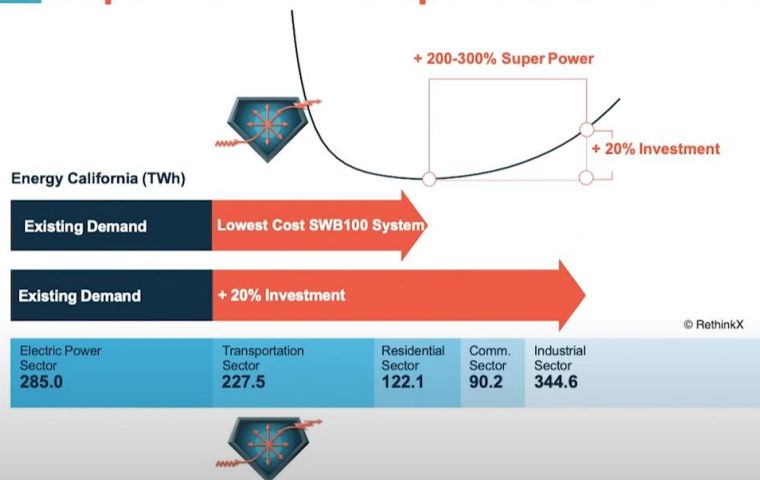


Built out by 2030, even a region like New England would provide 2-3x excess power beyond what the region needs today at near-zero marginal cost. That excess energy then disrupts other energy uses for heat & transportation fuel. His Rethinking Energy video is on Youtube here:

<https://www.youtube.com/watch?v=PM2RxWtF4Ds>

Of course, a Washington version would reduce costs & risk by starting from this idea, adding in Demand Flexibility, pumped hydro storage, and utilizing existing hydro (even accounting for declining snowpack). Build 4x the capacity you need for resource adequacy, export power, generate hydrogen for heavy duty marine & freight vehicles, and move any remaining fossil-fuel-driven industrial process heat to electricity in steel, aluminum, paper, wood pulp, carbon fiber autoclaves for airplane wings, etc.

### Key Finding: Super Power: disruptive to all forms of energy



Be better. It's possible, at lower cost & risk than our current thinking, and we can do it faster than any other region due to our immense hydropower assets. Instead of account gimmicks that slow down the energy transition, we need leadership.

Brian Grunkemeyer

Founder & CEO

FlexCharging