I would like to comment on Docket UE-210183, Relating to Electricity Markets and Compliance with the Clean Energy Transformation Act. One of the core mandates of the Clean Energy Transformation Act (CETA) ensures that all electricity delivered to Washington customers is from nonemitting sources by 2045. However, the draft rule released by the UTC on October 12, 2021 would allow utilities to use fossil fuel-generated electricity in Washington past 2045, with no end date in sight. This is clearly inconsistent with CETA and must be revised in order to comply with the statute. Specifically, the draft rule must be revised to eliminate the use of "retained Renewable Energy Credits" and other provisions that would allow utilities to simply offset the continued use of fossil fuel-generated electricity, rather than providing 100% of electricity delivered to WA customers from nonemitting sources.

Clean energy offsets have a poor history of not reducing their announced amount of emissions and are poorly regulated and supervised. Clean energy offsets were not part of CETA when it became law in 2019 and have no place in its rulemaking. If it becomes part of the regulatory rules, then all the utilities will take advantage of this loophole and continue burning fossil fuel to the detriment of our climate.

Our state has provided a blueprint to the nation and the world, showing it’s possible to make a just transition to a 100% clean electricity future. Now it is time to follow the blueprint and not undermine it. Please faithfully implement CETA.

Sincerely,

Richard Voget