

**From:** [Thad Curtz](#)  
**To:** [Public Involvement \(UTC\)](#)  
**Subject:** Comment on Docket UE-210183  
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External Email

Dear Commissioners;

I'm opposed to the proposed treatment of retained RECs in the current Draft Rules on "Use". The justification for this is presumably that creating renewable power within the state and then exporting it without RECs ought to be treated as the equivalent of creating renewable power that's used within the state, because the unspecified power that's being used elsewhere will be treated as if it had no associated environmental benefits. Unfortunately, the history of the use of "unspecified power" in the Northwest makes it quite clear that is unlikely to happen.

As I expect you're well aware, Washington State allowed utilities to report their power as "unspecified" and assign it the carbon intensity of the system net mix for a number of years. This created an incentive for utilities to treat relatively dirty power as unspecified. Comparing Pacific Power's reported emissions in Washington under this provision with its reported emissions in Oregon, where this was not allowed makes it very clear that utilities should be expected to take advantage of opportunities like this if the rules we create allow them to. In 2014, thanks to reporting power as "unspecified" in Washington, Pacific Power's reported that 39% of its power came from coal. In Oregon, it had to report the actual number - 69%.

The proposal will allow this same sort of maneuver with our exported unspecified power, treating it as if it might have some "unspecified" relative environmental benefits, and producing partial double counting, since it would be counted at its full value here through the retained RECs, and as providing some additional benefit (depending on the allowance made by other states' reporting rules) elsewhere.

Best wishes,  
Thad Curtz