



King County

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UE-210183

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February 9, 2022

Amanda Maxwell

Executive Director and Secretary

Utilities and Transportation Commission

621 Woodland Square Loop SE

Lacey, WA 98503

RE: Docket UE-210183, Electricity Markets and Compliance with the Clean Energy Transformation Act

Dear Executive Director and Secretary Amanda Maxwell:

Thank you for the opportunity to provide comment on the second draft of the rules submitted to this docket on January 19, 2022. King County commented on the previous draft version of this rule in November 2021.

Clean electricity supplies are a key component to reaching King County's goal to reduce countywide emissions at least 50 percent by 2030 and 95 percent by 2050. The Clean Energy Transformation Act (CETA), which I strongly supported in 2019, provides a clear mandate that utilities must supply non-emitting sources of electricity. After reviewing the second draft of the rules, I maintain similar concerns as stated in my letter to the Commission in November with respect to compliance methodology.

A reading of the draft rule appears to allow "retained non-power attributes," which appear to be similar to renewable energy certificates, to count toward compliance with the requirement for clean electricity supplies. This approach could allow for offsets that prolong the transition to clean energy sources beyond the 20 percent alternate compliance methodology authorized in the statute. Alternate compliance options for 20 percent of energy supply from 2030-2045 are necessary to stabilize costs, build and strengthen the regional grid, and support a just transition for workers. However, we must move as fast as possible to reduce emissions from our electricity sources, in order to avoid the worst impacts of climate change that threaten the health and well being of King County and Washington State residents.

I urge the Commission to make explicit that retained non-power attributes or other substitutes for clean electricity supplies cannot be used to meet the standards set forth in the Clean

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Energy Transformation Act, which clearly states that only electricity from renewable and non-emitting generation sources can be supplied to meet retail loads starting January 1, 2045.

I greatly appreciate the diligence and commitment that Commission staff have shown during the complex rulemaking process for CETA. I encourage you to commit to adopting compliance standards that move Washington state toward 100 percent clean energy supplies envisioned by the Clean Energy Transformation Act as soon as possible. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Dow Constantine". The signature is written in a cursive style with a prominent initial "D" and a long, sweeping underline.

Dow Constantine

King County Executive