



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

UE-210183

INTERGOVERNMENTAL AFFAIRS

In reply refer to: AI-7

February 15, 2022

Filed via Email and Web Portal: <https://www.utc.wa.gov/docs/Pages/howToFile.aspx>  
Filed via Email to [ceta@commerce.wa.gov](mailto:ceta@commerce.wa.gov)

Amanda Maxwell, Director and Secretary  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Glenn Blackmon  
Washington Department of Commerce  
PO Box 42525  
Olympia, WA 98504-2525

Re: UE-210183 Additional Comments by the Bonneville Power Administration on the Clean Energy Transformation Act and Avoiding Double Counting of RECs

Dear Ms. Maxwell and Mr. Blackmon,

Bonneville Power Administration (BPA) is submitting these brief comments to request a modification to the language in each agency's January 2022 draft rules that addressed CETA's prohibition on double counting of unbundled renewable energy credits. This letter supplements the comments BPA submitted on Feb. 9 to the Department of Commerce and to the Utilities and Transportation Commission regarding the Clean Energy Transformation Act (CETA).

In reviewing comments submitted by other parties, BPA notes that the Feb. 9 investor-owned utilities' joint letter highlighted a concern that language in (4) below would restrict the use of RECs from BPA's power system sales in a manner inconsistent with CETA. BPA appreciates the investor-owned utilities shining a light on this concern. BPA has asked the state agencies to adopt rule language that acknowledges that BPA sells from a system of resources, and BPA appreciates that the state agencies have included rule language that acknowledges these system sales. However, BPA does agree with the investor-owned utilities' interpretation that the earlier language places a constraint on the use of RECs from BPA system sales that is inconsistent with CETA. This is because some state GHG programs do not regulate all utilities in that state and therefore there is no double counting of attributes for unbundled RECs associated with BPA's system sales to utilities not regulated under the state program.

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To fix that problem, BPA asks Commerce and the UTC to insert the underlined language below into each agency's respective rules.

(4) To claim and retire an unbundled REC for alternative compliance where the Washington-eligible RECs were created by renewable electricity marketed by the Bonneville Power Administration (Bonneville) a utility must demonstrate the REC was not associated with electricity from a system sale from Bonneville directly into a state with a GHG program and to an entity regulated by the state GHG program. The RECs are calculated based on the same vintage year as the year in which the electricity was imported to the state with the GHG program.

Thank you for considering this modification to your agency's rule language. If you have any questions, please contact me at 360-485-2392 or [ecklumpp@bpa.gov](mailto:ecklumpp@bpa.gov), or Alisa Kaseweter at 503-312-6816.

Sincerely,



Elizabeth C. Klumpp  
Washington Liaison  
Bonneville Power Administration