



Washington State
Department of
Commerce



UTC
Washington Utilities
and Transportation
Commission

Joint Rulemaking Workshop

Treatment of Energy Storage for Compliance with
RCW 19.405.030 Through 19.405.050

June 22, 2021 - 9 a.m. to noon



Participation information

- [Click to join meeting](#)
- <https://wastatecommerce.zoom.us/j/86354894145?pwd=V28reEZLWINwMEh5Q0dZdUhtZVNDdz09>
- Password: Energy
- Join by phone: (253) 215-8782
 - conference ID: 890 9305 6157#;
 - passcode: *521222#
- Phone participants - *6 to mute and unmute
- Technical issues? Please contact Austin Scharff –
 - (360) 764-9632
 - austin.scharff@commerce.wa.gov



Agenda

1. Scope and Process for Issues and Workshop
2. Commissioner remarks
3. Opening remarks and summary of comments
4. Ten-minute break
5. Panel discussions – “Problem Solving Pods”
 - a) Track the sources of electricity used in charging
 - b) Ignore storage activities and focus on generation and load
 - c) Effect on storage and generation resource choices
 - d) Demonstrating delivery of renewable generation
6. Next steps: Dept. of Commerce and UTC



Scope and Process for Issues and Workshop

- Three ‘tracks’ for rulemaking:
 - Interpretation of “use”
 - Market purchases and double-counting
 - Storage accounting



Opening remarks and summary of comments

Organizations filing written comments:

- Joint utilities: Avista Corporation, Pacific Power, Puget Sound Energy, Public Generation Pool, WA Public Utility Districts Association
- Northwest Energy Coalition
- Climate Solutions
- WA State Public Counsel
- US Energy Storage Association
- Renewable Hydrogen Alliance
- Renewable Northwest
- Western Power Trading Forum
- Center for Resource Solutions

Speakers are requested to keep opening remarks to about three minutes.

If your organization is not listed but you would like to speak, please let us know using the chat function of Zoom.



10-minute break



Panel discussions

<i>Panel</i>	Panelist	Panelist	Panelist
<i>a. Track sources of electricity for charging</i>	Pacific Power - Jessica Zahnow	Western Power Trading Forum - Clare Breidenich	Climate Solutions - Kelly Hall
<i>b. Ignore storage activities and focus on generation and load</i>	PSE - Ben Farrow	US Energy Storage Association - Julian Boggs	Renewable Northwest - Sashwat Roy
<i>c. Effect on storage and generation resource choices</i>	Snohomish PUD - Garrison Marr	Avista - James Gall	NWEC - Joni Bosh
<i>d. Demonstrating delivery of renewable generation</i>	Climate Solutions - Kelly Hall	Renewables Northwest - Sashwat Roy	NWEC - Joni Bosh



Panel A: *Track sources of electricity for charging*

Participants:

- Pacific Power - (not yet fully confirmed)
- Western Power Trading Forum - Clare Breidenich
- Climate Solutions - Kelly Hall

Prompt:

Some stakeholders propose that storage resources track the electricity used in charging or demonstrate that 100% is renewable. Other stakeholders have stated that it is impossible to track the source of electricity used for charging.

- Is it any harder or easier to track electricity for charging than to track electricity for end uses?
- What benefits would result from tracking the source of electricity for charging?
- Would it be feasible to apply a tracking requirement to non-utility operators of storage resources?



Panel B: *Ignore storage activities and focus on generation and load*

Participants:

- PSE - Ben Farrow
- US Energy Storage Association - Julian Boggs
- Renewable Northwest - Sashwat Roy

Prompt:

Some stakeholders have proposed that storage charging and discharging be disregarded in determining CETA compliance. Instead compliance would be determined by comparing generation to load. No RECs would be retired for the energy losses in charging/discharging, and these RECs would be available for compliance.

- Would this policy provide a useful incentive to deployment of storage resources? Or would it open a loophole in the GHG neutral standard by allowing additional fossil generation?



Panel C: *Effect on storage and generation resource choices*

Participants:

- Snohomish PUD - Garrison Marr
- Avista - James Gall
- NWECC - Joni Bosh

Prompt:

- If the accounting rules disregard storage activities, would this policy discourage development of higher efficiency storage technologies, since energy losses in charging/discharging are not accounted for?
- Would it discourage development of renewable resources with greater capability to meet peak demand and a diverse combination of renewables that better matches the load profile, since compliance is based on total generation not the relationship between generation output and load?



Panel D: *Demonstrating delivery of renewable generation*

Participants:

- Pacific Power – Jessica Zahnow
- Western Power Trading Forum - Clare Breidenich
- Climate Solutions - Kelly Hall

Prompt:

Stakeholders have noted that storage allows the delivery of electricity to load at a different time from when it is generated.

- If the accounting rules disregard storage activities, would a utility be able to demonstrate that its load was served using renewable generation (if so required)?



Next steps

Original proposed rulemaking schedule:

- June 9 – workshop (cancelled)
- June 22 – energy storage workshop
- July 30 – 1st draft of proposed rules
- August 27

Notice cancelling June 9 workshop:

- June 25 – UTC and COM to receive “any collaborative solution”
- July 1 – based on any proposal received by June 25, UTC and COM to “establish dates for a workshop and written comments on the interpretation of RCW 19.405.040(1)(a).”



Thank you!

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Rulemaking webpage:

<https://www.commerce.wa.gov/growing-the-economy/energy/ceta/>

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Rulemaking docket: UE-210183 –

<https://www.utc.wa.gov/casedocket/2021/210183>

