

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	
)	DOCKET UE-121594
PUGET SOUND ENERGY, INC.)	
)	Exhibit A to NW Energy
for a Determination of Emissions)	Coalition's Response
Compliance)	
)	
.....)	

1 Subject: Emissions Performance Standard Rulemaking
2 Date: Wed, 10 Oct 2012 08:53:46 -0700
3 From: "Motteler, Jennifer (COM)" <jennifer.motteler@commerce.wa.gov>
4 To: "Motteler, Jennifer (COM)" <jennifer.motteler@commerce.wa.gov>
5

6 Dear Emissions Performance Standard (EPS) stakeholders:
7

8 It has been seven months since our Preproposal Statement of Inquiry ("CR-101") was
9 published in the Washington State Register on March 7, 2012. On April 11, 2012 and
10 August 6, 2012 we held face-to-face stakeholder meetings, and in the interceding period
11 consulted with a stakeholders' technical subgroup to refine the combined cycle
12 combustion turbine (CCCT) survey required by Revised Code of Washington (RCW)
13 80.80.050. At the request of several stakeholders present at the second meeting, we
14 issued a concrete deadline for receiving written comments during the Preproposal phase,
15 which was set at August 28, 2012.
16

17 We received copious comments on and prior to August 28, but do now feel that we have
18 made sufficient progress parsing and responding to them to feel confident issuing a
19 timeline for the rest of the process. From this point forward, unless stakeholders bring
20 forth major considerations that were not brought forth during the pre-proposal phase, we
21 expect the following:

- 22 1. On November 7, 2012, the Washington State Register will contain a Notice of
23 Proposed Rulemaking ("CR-102") proposing to set the Emissions Performance Standard
24 to 980 lb/MWh, barring the discovery of any additional need for adjustments between
25 now and then.
- 26 2. On or prior to November 7, 2012, Commerce shall provide the Legislature the
27 survey of new combined-cycle natural gas thermal electric generation turbines
28 commercially available and offered for sale by manufacturers and purchased in the
29 United States, per the requirement of 80.80.050. This report shall describe the

1 methodology and logic you are all already familiar with through the draft EPS calculator
2 spreadsheets, with some adjustments made in response to stakeholder comments.

3 3. On or prior to November 7, 2012, the Department of Ecology shall provide the
4 Legislature with its review of EPS effectiveness per RCW 80.80.080.

5 4. On or prior to November 7, 2012 Commerce will describe to EPS stakeholders, in
6 writing, how it considered EPS impacts to system reliability and customer costs in
7 adopting and implementing the EPS.

8 5. On or prior to November 7, 2012 Commerce will provide to EPS stakeholders a
9 summary of the comments received from them, further describing how those comments
10 affected the survey, our consideration of reliability and cost, and the proposed rule.

11 6. On November 28, 2012 Commerce will hold a public hearing to receive comment
12 on the proposed rule. Written comments will be due five days later, at 8am on Monday,
13 December 3.

14 7. Unless comments have a significant impact on the value of the EPS as proposed in
15 the CR-102, Commerce will file and adopt the rule on Thursday, December 20.

16 8. The rule becomes effective Monday, January 21, 2013.

17 9. The Department of Ecology will open a rulemaking for WAC 173-407-130 in
18 Spring, 2013 to set appropriate rules allowing it to enforce the new EPS.

19
20 Regards,

21
22 Greg Nothstein
23 Washington State Energy Office
24 tel 360-725-3112
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