

UE-210183

November 27, 2023

***VIA ELECTRONIC FILING***

Kathy Hunter  
Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Received  
Records Management  
Nov 27, 2023

**RE: Docket UE-210183—PacifiCorp’s Comments—Relating to Electricity Markets and Compliance with Clean Energy Transformation Act “Use” Rules**

On October 25, 2023, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments on updated draft rules related to the interpretation of “use” under the Clean Energy Transformation Act (CETA).

PacifiCorp supports the Commission’s adoption of the updated draft rules. The proposed rules support utility compliance accounting over four-year periods, as outlined in RCW 19.405.040(1)(a)(ii), and are consistent with the rules adopted by Commerce, which is necessary to ensure investor-owned utilities and public utilities in Washington are operating by and subject to consistent standards. In addition, the proposed rules provide much needed flexibility as utilities comply with CETA and also the Climate Commitment Act requirements.

PacifiCorp notes that the proposed rules do not resolve outstanding conflicts regarding the ability of utilities to both realize the full benefits of expanded organized markets (both as buyers and sellers of clean electricity) and use those resources’ RECs to comply with CETA.

PacifiCorp respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

Please direct informal questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/

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Enclosure