

UE-210183

February 16, 2024

Via Electronic Filing

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

Received
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Attn: Filing Center

Re: Rulemaking to consider adoption of Markets and Compliance Requirements for the Clean Energy Transformation Act - Docket No. UE-210183

Dear Ms. Hunter:

The Washington Public Utility Districts Association (WPUDA) is pleased to provide comments in this docket related to non-power attributes of renewable energy resources. WPUDA is a trade association comprised of 27 PUDs and one Joint Action agency. Many of our PUDs provide electricity and all are required to comply with CETA. Our members are regulated by locally elected officials and are required to follow the rules adopted by the Department of Commerce related to the accounting of non-power attributes. Our concern in this docket is for the rules that the UTC promulgates be consistent with the rules previously adopted by Commerce.

The UTC posed a number of questions to be addressed:

1. Should retained nonpower attributes be allowed to be used toward the 80 percent compliance option?

Yes. The non power attributes are an asset that is derived from the development and marketing of energy resources that have environmental attributes. To the extent that these attributes can be uncoupled from the electrical output of the facility they are financial compliance options that are usable to meet clean energy goals, provide financial incentives for the economic construction of renewable projects and allow for PUDs to provide financial and rate stability for their customers.

2. If retained nonpower attributes are not allowed to be used towards the 80 percent compliance obligation, how would this change affect a utility's planning processes, costs, and operations? What impact would this restriction have on customers?

Put simply, the less flexibility a utility has in meeting its compliance goals the more difficult it will be to meet those goals and provide rate stability for its customers. Reduced flexibility will likely translate into higher costs, other things remaining equal.

3. If retained nonpower attributes are not allowed to be used in planning for compliance towards the 80 percent compliance obligation, but are allowed to be used for compliance, how would this affect a utility's planning processes, costs, and operations? What impact would this restriction have on customers?

Same answer for Q2.

4. How would a restriction on retained nonpower attributes interact with utility requirements under the Climate Commitment Act?

Same answer for Q2.

5. If a utility engages in a day-ahead market, such as SPP's Markets+ or CAISO's Extended Day-Ahead Market, how would a restriction on retained nonpower attributes affect market participation?

Without knowing the fully involved rules related to how these markets operate it is difficult to assess the impact of these restrictions. However, the same logic as previously answered would conclude that the less flexibility you have in bringing the attributes associated with clean energy the more difficult and costly it will be to comply.

In conclusion it is our belief that allowing the non-power attributes to be used for planning and compliance goals is consistent with developing clean renewable generation, while at the same time providing flexibility in compliance reducing costs to consumers.

Sincerely,



Nicolas Garcia, Policy Director

Washington Public Utility Districts Association