

Docket number of this proceeding: UE-210183
Commenting party's name: James Adcock, Electrical Engineer
The title and date of the comment or comments:
Comments of James Adcock Regards UE-210183 6/19/2024

Received
Records Management
Jun 20, 2024

While in general I continue to not support such broad-blanket definitions which does not correspond to the real and actual amount of clean energy served to retail sales by utilities, in addition in particular I see two problems in this current "limitation" definition:

"The sum of load served by the utility before line losses and the amount of battery charging that occurred within that month."

First, the amount of power coming and going into batteries is being double-counted -- or could be double-counted using this definition. If you count the amount of power going into batteries, then you should not also be counting the amount of power coming out of those batteries to serve customer load. To fix this problem the definition would need to say something like:

"The sum of load served by the utility before line losses, and the amount of battery charging that occurred within that month minus the amount of load served by those batteries."

Secondly, it would be farcical to allow utilities to count load served by the utility that is clearly actually being served by their own fossil fuel generation. This situation occurs at least when a utility is fossil-fuel-generating within their own region and is clearly not "exporting" that fossil fuel out of their region to another utility for that utility to "use." Such a situation occurs, for example, when a utility does not export power during a given month, as evidenced by actual power flows on real actual power lines. If no such power flows on actual power lines from the utility to another utility, then the utility has actually retained the fossil fuel generation for their own use, and thus is not generating that power for any other utility to use, and thus is "Using" that fossil fuel power to serve their own loads, and not Using renewables or non-emitting to serve that portion of load. If the regulations do not reflect this reality, then the regulations do not faithfully implement the requirements of RCW 19.405.040.

In which case the "limitation" should read something like:

"The sum of load served by the utility before line losses, and the amount of battery charging that occurred within that month minus the amount of load served by those batteries, and also minus any amounts of fossil fuel generated power within the utility's region which was not actually exported from the utility's service region for another utility to use."

In addition to what Utilities contemplate in terms of prohibiting representation in general of the "green" attributes of electricity sold stripped of their NPAs, in addition to the language "utility sells electricity in a wholesale market sale without its associated NPA", further it should be required "neither seller nor purchaser will make any representation whatsoever as to the generating source of this power". IE the sold power must be considered both by seller and purchaser as being "Unspecified Power."

Further, please remember that CETA already provides Utilities the 20% "alternative compliance" flexibility amount -- that 20% already allows utilities to perform that amount of "resource shuffling" as they like. So what Utilities are asking for instead is that UTC ignore the 20% limit. If, in some months, a utility generates 100% clean energy, then that means in some other months [within the four-year period] CETA allows that they can continue to generate 40% of their power from fossil fuel. In fact, if they have enough clean energy to meet their needs in most months, then in some months out of the 4-year period they could even actually continue to generate 100% of their power from fossil fuel! CETA already gives utilities a tremendous amount of flexibility. Again, what Utilities are really asking for is that UTC ignore the 20% limits on flexibility already built into CETA law, using instead unlimited amounts of unbundled RECs and NPAs.

In general Renewables are not more expensive than fossil fuel, if one includes total fossil fuel costs, including damages to human society from GHG emissions, currently estimated using best scientific knowledge [EPA] to be \$230 [2030] per metric ton, rising to \$300 in 2045. Then total fuel costs for continued fossil fuel generation, is about \$140 per megawatt hour in 2030, rising to about \$175 per megawatt hour in 2045. Despite these high costs, prior to 2045 I would expect utilities to continue to rely on fossil fuel in rare "high cost" situations, such as during heat waves -- assuming fair implementation of CETA rules.

Clearly the counterpart to Utilities' recommendations focusing on renewable and non-emitting Generation and not the actual Use of that generation, is to shift focus away from the then-continuing unabated fossil fuel generation. The clear intent of CETA is to greatly reduce use of fossil fuel generation by Washington State utilities, and that does not happen when overly permissive definitions of "Use" are adopted. If fossil fuel generation is not actually greatly reduced, then the implementing rules are not faithful to CETA law. CETA clearly is defined in terms of actual utility "Use", not in terms of mere "Quantity of Generation."

Thank you,

James Adcock, Electrical Engineer