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November 27, 2024

Via Electronic Filing

Jeff Killip
Executive Director
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: In the Matter of WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION, Rulemaking Relating to Electricity Markets and
Compliance with the Clean Energy Transformation Act.
Docket UE-210183

Dear Executive Director Killip:

Please find enclosed the Comments on behalf of the Alliance of Western Energy Consumers (“AWEC”) in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Nannette Moller
Nannette Moller

Enclosure

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)
) DOCKET UE-210183
WASHINGTON UTILITIES AND)
TRANSPORTATION COMMISSION,) COMMENTS OF THE ALLIANCE OF
) WESTERN ENERGY CONSUMERS
Rulemaking Relating to Electricity Markets)
and Compliance with the Clean Energy)
Transformation Act.)
_____)

1 Pursuant to the Washington Utilities and Transportation Commission’s (“Commission”) November 4, 2024 Notice of Opportunity to Provide Written Comments on Draft Rules (“Notice”), the Alliance of Western Energy Consumers (“AWEC”) files these Comments.

2 AWEC greatly appreciates the Commission’s changes to its Draft Rules governing markets and compliance with the Clean Energy Transformation Act (“CETA”). As amended from the previous draft, AWEC believes the Draft Rules will comply with CETA’s statutory requirements and will ensure that customers are not unduly harmed by the compliance requirements imposed on utilities. Specifically, AWEC commends the Commission in adopting a four-year period in which utilities may use RECs and Non-Power Attributes to demonstrate CETA compliance, consistent with RCW 19.405.040(1)(a).

3 AWEC looks forward to continuing to engage with the Commission, utilities, and other stakeholders as CETA’s implementation continues. In the meantime, AWEC urges the Commission to adopt the Draft Rules. To the extent the utilities or other stakeholders have recommendations for amendments to the Draft Rules that would further ensure consistency with

CETA and the protection of customers from unwarranted cost increases, AWEC reserves the right to support such recommendations.

Dated this 27th day of November 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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*Of Attorneys for the
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