



Northwest CHP Application Center

Combined Heat and Power for the states of
Alaska, Idaho, Montana, Oregon and Washington
in cooperation with the U.S. Department of Energy



February 26, 2007

To: Elizabeth Klumpp, Senior Energy Policy Specialist, Department of Community, Trade and Economic Development

From: Dave Sjoding, Team Leader

Subject: Energy Independence Act scope of rulemaking

Thank you for hosting the I-937 rulemaking workshop. The following comments regarding the scope of the rulemaking are made for the record. Washington Administrative Rules are encouraged in two areas:

- a) Clarifying the definition of "high efficiency co-generation" in RCW 19.285.040 (1) (C) including an example of the calculation to derive system efficiency.

Reason for including in the rulemaking process: A clear understanding of what does and does not qualify as "high efficiency co-generation" will help project developers to know upfront what is the standard; and

- b) Clarification as to whether or not non-electricity based carbon credit revenue pathways such as methane reduction (for example, elimination of dairy manure lagoons) are included in the "non-power attributes" definition of RCW 19.285.030 (13) and (17).

Reason for inclusion in the rulemaking process: To ensure upfront clarity of which revenue streams are and are not included in for project developers

It is further recommended that specific steps be taken in these two areas, to ensure coordination with the Utilities and Transportation Commission's rulemaking process for I-937.

cc: Nicholas Garcia, Utilities and Transportation Commission
Jay Gordon, Washington State Dairy Federation

925 Plum St SE, Bldg 4 • P.O. Box 43165 • Olympia, WA 98504-3165
(360) 956-2004 • Fax (360) 236-2004 • TDD: (360) 956-2218

Cooperating agencies: Washington State University Extension Energy Program, U.S. Department of Energy, Alaska Energy Authority, Idaho Department of Water Resources Energy Division, Montana Department of Environmental Quality Energy Program and Oregon Department of Energy