



Energy Independence Act (EIA) Rulemaking (UE-190652)

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Background

- Energy Independence Act (EIA) passed by initiative in November 2006
 - WAC 480-109
- In 2015, UTC added WAC 480-109-300, “Energy and emission intensity metrics”
 - Requires investor-owned utilities to submit energy and emission intensity (EEI) reports by June 1 each year
 - Metrics include (existing language):
 - Average megawatt-hours per residential customer;
 - Average megawatt-hours per commercial customer;
 - Megawatt-hours per capita;
 - Million short tons of CO₂ emissions; and
 - Comparison of annual million short tons of CO₂ emissions to 1990 emissions



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- Undertaken to incorporate amendments found in Clean Energy Transformation Act (CETA), amendments found in 2017 ESB 5128, and changes to clarify or streamline rules
- CR-101 with draft rule language released Oct. 4, 2019
- Comments received from stakeholders Nov. 4, 2019
- Current status
 - Staff is reviewing stakeholder comments, with further process to come



Proposed Amendments to WAC 480-109-300

- Goal is to align EEl reports with CETA Section 7
- Amendments directly from CETA
 - Changing “short” tons to “metric” tons
 - Changing references to “CO₂” to “CO₂e”
 - Adopting 0.437 metric tons of CO₂/MWh for unknown generation sources, unless Ecology adopts a different emissions rate



Stakeholder Feedback

- Stakeholders initially have supported adding the definitions of “CO₂e” and “greenhouse gases” from CETA to WAC 480-109, as well as measuring metric tons instead of short tons and CO₂e instead of CO₂
- Stakeholders had a variety of responses to a question around measuring non-CO₂ emissions from unspecified generation sources
 - Several suggestions on global warming potential values and lifespans for methane
 - Other stakeholders recommended setting a rate in conjunction with Depts. of Ecology and Commerce
- UTC received a variety of responses to a question about whether utilities should report on emissions occurring in the gathering, transmission, and distribution processes



Next Steps

- UTC Staff is considering all stakeholder feedback and will propose additional changes as necessary
- Goals for today:
 - Listen
 - Answer process questions
 - Consider new feedback as appropriate

