

RICK ^{NAME}
NEIL
CHRIS
SW

PHONE

NW 1W

26 May 2017

KEVIN
ROB
RICHARD
VEE
PAUL

BASELINE

CREDIT MARKET
PROCEDURAL ISSUES

BASELINE ^{ENERGY-SAVE} ^{INTERDISCIPLINARY} ^{PROPOSED}
1) CAR - EITE INDUSTRY

NC DO CONDITIONS ACKNOWLEDGE EITE?

CAR USES INDUSTRY CODES,
CURRENTLY NOT THERE. 325199

JULY 13
2016
LETTER

WE WOULD CONSIDER IT, MAY
NEED TO DO RULE-MAKING ^{NOT 100} ^{ALREADY} ^{THREAT.}

- EFFICIENCY ANALYSIS COULD
CHANGE REDUCTIONS 0.7 - 2.2% ^{1/2}
- COULD CHANGE LIMITS

WOULD BE COMMERCIALIZED w/ CAP

NC - PATHWAY DOESN'T MATTER TO US

RD - BASELINE / BENCHMARKING -
REFERENCE PLANT?

NC - EITE WANTS SIZE-SPECIFIC ANALYSIS

KC - COMPARABLE FACILITIES - WHERE WOULD
DATA COME FROM? PREFERENCE TO US SITES

RICK CREDIT MARKET

3 OPTIONS FOR REDUCTIONS

- TRADE w/ OTHERS
- PROVIDE ERUs IN-STATE
- PROVIDE ERUs OUT-OF-STATE

DOESN'T APPEAR TO BE A CREDIBLE
IN-STATE MARKET FOR ERUs

(2)

WANT BENEFITS TO ACCRUE IN WA,

- IF NOT A PROGRAM IN STATE -
WILL WE HAVE TO GO OUT OF STATE,
OR ARE THERE OTHER OPTIONS
FOR DEVELOPING AN INNOVATED PROGRAM?

SW - YES, CAN LOOK AT OPTIONS
VOLUNTARY PROGRAMS
RENEWABLE ENERGY MARKETS
THERE ARE OPTIONS UNDER CAR

ROB - FLEXIBILITY IS THERE, RIGHT?

ROL - YES, RECOMMEND KEEPING IT, RATHER
THAN LOCK IT IN

RDB - WHAT ARE OPTIONS FOR US GIVING CREDITS?
BRINGING IN OTHER, CLEANER POWER?
WOULD IT COUNT ABOVE + BEYOND?

SW - COULD BE, HAVE TO LOOK AT IT.

RICK

KENT - CAR SAVVIES - YOU FOLLOW CAR
CAR DOESN'T - YOU FOLLOW CAR

RICK - WHAT IS YOUR AUTHORITY
PUBLIC INTERESTS
ADVERSE IMPACTS TO SHORELINE

NC - ALSO COVERS STARTUP

VB - WHAT ABOUT 3-YR STARTUP?
THAT'S MORE THAN CAR

3

COULD BE A GAP

RK - WHAT IF RULE CHANGES

RK - WHAT IF RULE CHANGES $X \rightarrow X-1$

RK - ANOTHER QUESTION RE AUTHORITY

SMB PROCESS

GMS IN PERMIT -

INTERVENORS?

BUSINESS MODEL

APPEAL OPTIONS -

MEET w/ RK

TIMING - JUNE 19

2401

951 6694

4 MAY 2017

NW1W

(360) 673-2099 PIN 78000

RICHARD DeBOLT, VEE GODLEY, PAULS EHLERS

SENT MORE TO NEIC ~ 12 YESTERDAY

ANY ISSUES AT ALL, LET ME KNOW (RD)

> MIN AS MAX? IN TABLE NEIC (PREPARED)

OPTIONS FOR MITIGATION &

BASELINE? ✓ SWAAA
≤

- 1- ARE THEY AN ETE, OR NOT? ^{EFFICIENCY} BASELINE
 - 2- HOW TO CALCULATE BASELINE? ^{EMISSIONS} BASELINE
 - OPERATE FOR 3 YRS, GET AVG EMISSIONS
 - FULL-ENGINEERING ANALYSIS, w/ MODELLED LOADS
- 852 KT - BEGINNING
750 KT - END OF LIFE

- FULL ANALYSIS w/ SYR cycle
- CHRIS CONN - ENGINEER
IF, THEN, OR
UNDER CAR, OR EQUIV
SAME STANDARDS

TY - ^{IN} ANY YEAR W/ EMISSIONS MORE THAN X, SOME OTHER MIT.

BASLINE - 1.78/yr

3 TO 5 YR GOES TO RULE-MAKING

CAR BASED ON EMISSION REDUCTIONS
CARBON MARKET
EXISTING RESERVE

TY - FUNDAMENTAL DECISIONS IN PERMIT

- NOT EITE (INDUSTRIAL CODE)**
 - LIMITS BASED ON
 - EMISSIONS REDUCTIONS BY
 - IF CAR GOES AWAY, STILL REDUCE
- LIMIT GAPS

~~**~~ CODES IN RULE - CONFIRM BY US

MITIGATION CONDITION "IF'S TO
HANDLE CONTINGENCY

IF EITE - RATE-BASED EFFICIENCY

IF NOT EITE

SHALL SUBMIT MITIGATION PLAN
FOR 100% IN 1 YR. UNLESS
CAR REQUIRES DIFF.

4 MAY 2017

(3)

Nulle
(cont)

A. # THAT THEY HAVE TO MITIGATE
UNLESS/UNTIL CAR DOES
DIFFERENT.

REDUCE FROM REPORTED #
- STATUTORILY-GROUNDED EMITTING BASELINE

SHALL MITIGATE FROM ANNUAL REPORTED
EMISSIONS (ROLLING AVERAGE)

(PROJECTS, PROGRAMS, AND ALLOWANCES)

UNTIL CAR KICKS IN

LEAVES EITE OPTION OPEN