

# Clean Energy Transformation Rule: Stakeholders Meeting

February 12, 2020



# Clean Energy Transformation Rule

## Public meeting – Agenda

1:30 p.m. **Introductions and Welcome**

1:40 p.m. **Inputs to Regulatory Analyses** – Sam Wilson

2:00 p.m. **Energy Transformation Projects** – Bill Drumheller

- Approaches to developing potential ETP categories
- Approaches to protocol development
- Public involvement and comment
- Establishing priorities
- Unaddressed areas

4:15 p.m. **Next steps** – Debebe Dererie

4:30 p.m. **Adjourn**



# Economic Analyses at Ecology

February 12, 2020

**Sam Wilson**

Regulatory Analyst | Ecology Governmental Relations

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# Overview

## Ecology's economic analyses

- **Examine and report**
  - Anticipated costs and benefits of regulations, etc.
- **Support**
  - Rules
  - General permits
  - Legislative reports and requests, Chemical Action Plans, etc.
- **Rely on**
  - Real-world quantitative data
  - Qualitative information
  - Comprehensive regional economic models
  - Rigorous methods
- **Are conducted independently from rule development**



# Rulemaking Economics

## Rule Proposal Phase (CR-102)

- **Preliminary Regulatory Analyses** document published with proposed rule language

## Rule Adoption Phase (CR-103)

- **Final Regulatory Analyses** document published with final rule language
- Response to economic comments in Concise Explanatory Statement



# How can you contribute?

- We regularly work with stakeholders to:
  - **Gather data related to:**
    - How you do things now
    - What would be different
    - Anticipated costs/benefits of changes
    - Potential qualitative impacts
  - **Check our assumptions**
  - **Let us know if we missed anything**



# A few key questions to consider

- How would the rule changes affect you?
- What specific costs or benefits do you expect as a result of the changes?
- In what ways could we achieve the goals of the changes while mitigating costs to you?

\*See “Economic questions” handout for additional info



# Thank you!

Sam Wilson

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# Clean Energy Transformation Rule: Draft Rule Outline for Energy Transformation Projects

Bill Drumheller  
Air Quality Program

**Rulemaking Meeting #2**  
February 12, 2020



# Goals for Today

- Quick review of last meeting
- Key concepts for context
- Review draft rule outline
- Focused discussion
- General concerns



# Review: Proposed ETP Concept

Determine the types of ETPs that are potentially eligible

Public process established in rule

Role for future additions?



Interested parties submit project proposals

Process established in rule

Protocol as part of proposal?

Separate protocol development?



Ecology evaluates proposals

Process established in rule

Public comment (Project? Protocol? Other?)



Projects meeting requirements are recognized



# Key Concepts

- Trade-offs with rulemaking vs. administrative processes
- What is a protocol?
- Why a protocol-based approach?
- Role of agencies vs. the role of the utilities in protocols and projects
- Pre-project vs. post-project steps



# Key Discussion Topics

- Approaches to developing category list
- Approaches to protocol development
- Public involvement and comment
- Establishing priorities
- Unaddressed areas





# Questions and Discussion

# Next Steps

- Next stakeholder meetings at Ecology:
  - March 16, 2020 (1:30-4:30 p.m.)
    - GHG emission content calculation
    - Energy transformation Projects
  - April 9, 2020 (9 a.m.–12 p.m.)
- Summary of this meeting will be emailed or posted on the rulemaking web page by **Feb 19, 2020**
- Provide comments and suggestions by **Feb 21, 2020**  
<http://aq.ecology.commentinput.com/?id=TYfx2>



# Comments and Suggestions

https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-444

The screenshot shows the website for WAC-173-444. The header includes the Department of Ecology logo and navigation links for Regulations & Permits, Research & Data, About Us, and Contact Us. A secondary navigation bar lists Home, Air & Climate, Water & Shorelines, Waste & Toxics, and Spills & Cleanup. The main content area is titled "Public input & involvement" and includes a "Public comment period (informal)" from Dec. 20, 2019, to April 20, 2020. A link to "Submit your comments online and read others' comments" is highlighted with a green arrow. Below this is a section for "Ecology's meetings with stakeholders" with a table of dates, documents, and locations.

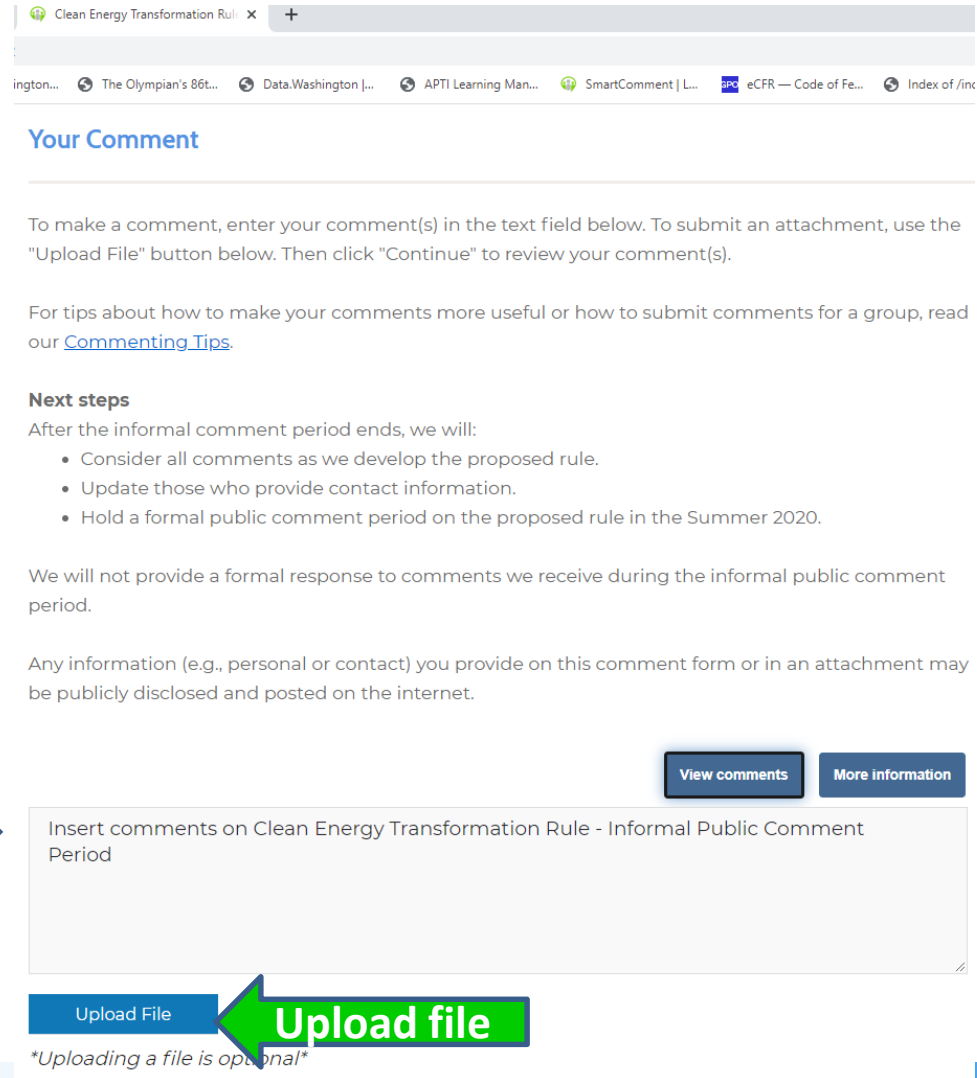
Date	Documents	Location
Tuesday Jan. 14, 2020	<a href="#">Agenda</a> <a href="#">Draft rule language</a>	Ecology, Lacey ( <a href="#">map to location</a> ) <a href="#">Register to attend</a> (in person or webinar) *
Wednesday Feb. 12, 2020	none yet	Ecology, Lacey ( <a href="#">map to location</a> ) webinar *
Thursday April 9, 2020	none yet	Ecology, Lacey ( <a href="#">map to location</a> ) webinar *





# Comments and Suggestions

http://aq.ecology.commentinput.com/?id=TYfx2



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## Your Comment

To make a comment, enter your comment(s) in the text field below. To submit an attachment, use the "Upload File" button below. Then click "Continue" to review your comment(s).

For tips about how to make your comments more useful or how to submit comments for a group, read our [Commenting Tips](#).

### Next steps

After the informal comment period ends, we will:

- Consider all comments as we develop the proposed rule.
- Update those who provide contact information.
- Hold a formal public comment period on the proposed rule in the Summer 2020.

We will not provide a formal response to comments we receive during the informal public comment period.

Any information (e.g., personal or contact) you provide on this comment form or in an attachment may be publicly disclosed and posted on the internet.

[View comments](#) [More information](#)

Insert comments on Clean Energy Transformation Rule - Informal Public Comment Period

[Upload File](#) [Upload file](#)

*\*Uploading a file is optional\**

Comment here

Upload file



# More Information

- Rulemaking web page:  
<https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-444>
- To join the e-mail notification list:  
<http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=ECOLOGY-CLEAN-ENERGY-UPDATES&A=1>

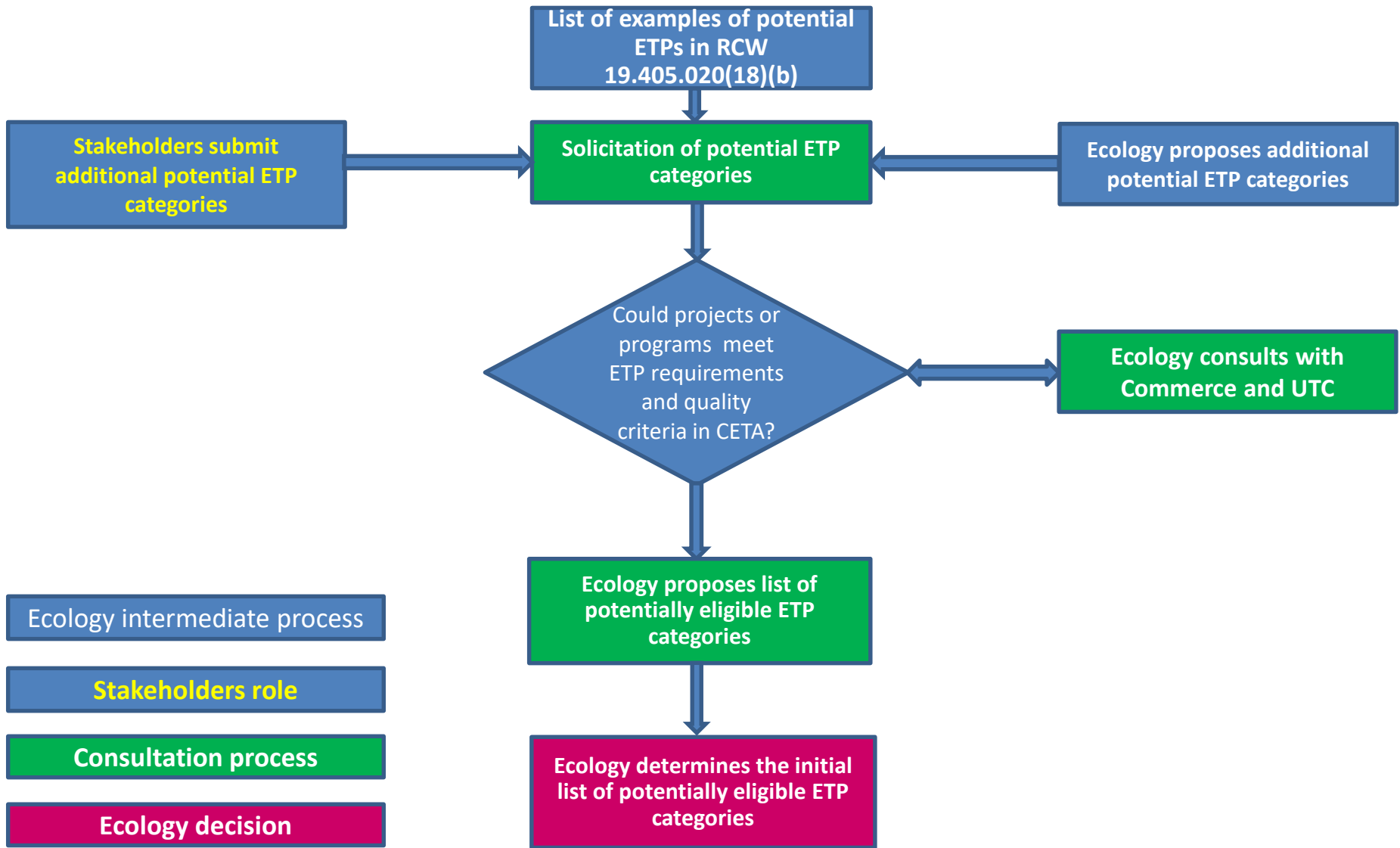


# Contacts

- Rulemaking process and timeline
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- Energy transformation projects
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- GHG content calculation
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- Regulatory analyses
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# Potentially Eligible ETP Categories



# Protocol Development Process

