

CLEAN ENERGY

Bill Number: HB 2021 – Clean Energy

Chapter: 508, OR Laws 2021

Effective Date: Sept 25, 2021

Adds new provisions and amends ORS 469A.005, 469A.205, 469A.210, 757.247, 757.603, 757.646 and 757.649 to create clean energy targets for IOUs and ESSs, to allow communities and utilities to jointly propose customer supported renewable programs, and to impose responsible contractor labor standards for certain energy projects

<i>Rulemaking Required?</i>	<i>Report Required?</i>	<i>Other</i>
Yes	No	<ul style="list-style-type: none"> • PGE and PAC to file biennial reports with PUC on Community Benefits on Clean Energy Plans • Utilities to file annual reports with PUC on Community Supported Renewables • ODOE to report to Legislature on small scale/community renewables opportunities

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Bill Summary

<https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/HB2021/Enrolled>

House Bill 2021 makes numerous and significant changes to the laws governing the PUC, the Department of Environmental Quality (DEQ) and the Oregon Department of Energy (ODOE) to promote clean energy. The bill contains five major parts:

- (1) Establishes an emissions-based clean energy framework for electricity providers
- (2) Creates Customer Supported Renewable program for local governments
- (3) Adopts labor standards for certain energy projects
- (4) Directs ODOE to examine, with PUC help, opportunities for small scale and community-based renewable energy projects, and
- (5) Creates a Community Renewable Energy Project Grant program in ODOE

The bill also:

- Amends ORS 469A.210 to increase the small-scale renewable energy project requirement for PGE and PacifiCorp from to 10 percent capacity by 2030, and
- Prohibits the Energy Facility Siting Council from siting any new generation facility that produces power from fossil fuels or to amend a certificate that would significantly increase carbon dioxide emissions from an existing facility

In this document, the bill summary and major tasks are grouped into three separate sections. The first section summarizes the Clean Energy provisions, followed by the major tasks required or anticipated under Sections 1-15 of the bill. The second section does the same for the Community Supported Renewables provisions found in Sections 20-24. The third section summarizes the other provisions of the bill related to Responsible Labor Standards (Section 26), Study on Small Scale Renewable Energy Projects (Section 18), Community Renewable Energy Project Grant program (Section 29-35), and other provisions.

Clean Energy: Sections 1-15

1. Summary

These sections set greenhouse gas (GHG) emission reduction targets for “retail electricity providers,” defined as PGE and PacifiCorp,¹ as well as Electricity Service Suppliers (ESSs). Implementation of the program is shared between the PUC and DEQ:

- DEQ’s primary responsibilities relate to GHG emissions data—determining baseline emissions and reductions necessary to meet 2030 and 2035 interim targets and verifying projected emissions reductions
- PUC is primarily responsible for review and acknowledgment of required clean energy plans from electric companies and review of information filed by ESSs, taking actions to protect reliability and limit rate impacts.

a. Targets (Sections 3 and 12-13)

HB 2021 requires retail electricity providers to reduce greenhouse gas emissions associated with electricity sold to Oregon consumers to:

- 80 percent below baseline emissions levels by 2030
- 90 percent below baseline emissions levels by 2035, and
- 100 percent below baseline emissions levels by 2040

The PUC may also, in furtherance of these targets, apply a performance incentive for early compliance with one or more of the clean energy targets. (Section 12)

These targets do not replace or modify the renewable portfolio standards (RPS) requirements of ORS 469A.005 to 469A.210. (Section 13)

b. Electric Company Clean Energy Plans (Sections 4-6)

PGE and PacifiCorp must submit “Clean Energy Plans” that are based on or included in an IRP filed no earlier than January 1, 2022 (or 180 days after the IRP is filed) (Section 4). A Clean Energy Plan must:

- Include annual goals/actions that make progress towards the clean energy targets;

¹ Idaho Power is exempt from Sections 1-15 of the bill.

- Include an examination of resiliency opportunities based on industry resiliency standards established by the PUC;
- Examine the costs and opportunities of offsetting energy generated from fossil fuels with community-based renewable energy; and
- Result in an affordable, reliable and clean electric system

The PUC must acknowledge the clean energy plan within six months if the plan is in the public interest and consistent with the clean energy targets (Section 5). In evaluating whether a plan is in the public interest, the PUC must consider:

- Any reduction of greenhouse gas emissions that is expected through the plan, and any related environmental or health benefits;
- The economic and technical feasibility of the plan;
- The effect of the plan on the reliability and resiliency of the electric system;
- Availability of federal incentives;
- Costs and risks to the customers; and
- Other relevant factors as determined by the PUC

PGE and PacifiCorp must convene a Community Benefits and Impacts Advisory Group to help inform a biennial report to the PUC on benefits and impacts (Section 6). The PUC must establish a process for the utilities to contemporaneously recover the cost associated with the development of biennial reports and the costs associated with compensation or reimbursement for time and travel of members of a Community Benefits and Impacts Advisory Group.

c. ESS Reporting (Section 5)

ESSs must report to the PUC:

- An estimate of annual GHG emissions associated with electricity sold to retail consumers for the current year and following three years;
- Annual goals for projected reduction of GHG associated with the electricity sold to retail consumers;
- Other information necessary, as determined by the commission, to demonstrate the ability to meet the clean energy targets, including:
 - Actions to make progress toward meeting the clean energy targets, and
 - Anticipated actions to quickly reduce GHG emissions at reasonable costs

The PUC shall review the information supplied by an ESS to determine reasonable progress toward compliance with the clean energy targets.

The PUC must also require an ESS to publicly disclose a summary of the aggregated energy supply mix and associated emissions of the power sources that serve the direct access retail electricity consumers of the electricity service supplier. (Section 25.)

d. Compliance (Section 8)

In determining whether a retail electricity provider has complied with the clean energy targets, the PUC may take into consideration unplanned emissions in excess of the amount projected in an electric company's clean energy plan or information reported by an ESS, to the extent that:

- Generation of electricity from non-emitting resources forecasted to meet electricity demand is less than expected, including variability in the generation, transmission, constraints or other causes, and
- The additional emissions are from the generation of electricity necessary to meet load.

A retail electricity provider that continues to be out of compliance with the clean energy targets for more than 12 months as a result of unplanned emissions must file a detailed plan to return to compliance as soon as practicable.

e. Reliability Pause (Section 9)

Upon its own motion or at the request of an electric company, the PUC may grant a temporary exemption to one or more of the RPS requirements or a clean energy plan. The PUC may grant a temporary exemption if compliance:

- Conflicts with or compromises an electric company's obligation to comply with mandatory reliability standards set by the North American Electric Reliability Corporation;
- Violates or significantly impairs a resource adequacy requirement or recommendation of a multistate, regional or national entity;
- Violates or significantly impairs an electric company's ability to comply with a Balancing Authority Area declaration;
- Results in the provision of service at other than fair and reasonable rates, or
- Otherwise compromises the power quality or integrity of an electric company's system

The PUC may allow an ESS the opportunity to receive a temporary exemption based on comparable procedures and criteria. The PUC may also grant an electric company or electricity service supplier a temporary exemption that is comparable to a temporary exemption granted to another entity without conducting a separate investigation if the PUC determines that the conditions that resulted in the granted temporary exemption holds for the other entities.

f. Cost Cap (Sections 10 and 11)

The PUC may direct, or an electric company or certain organizations (Citizens' Utility Board and Alliance of Western Energy Consumers) may request, an accounting for investments made, costs incurred or forecasted costs estimated by the electric company for the purpose of compliance with the clean energy targets. The PUC must use a contested case proceeding for such an investigation to determine:

- If an investment or cost of an electric company contributes to compliance with clean energy targets;

- The actual or anticipated rate impact for the investment or cost on the same basis and with the same treatment for similarly situated investments or costs in the most recent rate proceeding; and
- The cumulative rate impact caused by all investments or costs

If the PUC determines that the actual or anticipated cumulative rate impact calculated exceeds six percent of the annual revenue requirement for a year, the PUC shall provide an exemption from further compliance with the requirements of the clean energy targets.

The PUC must provide the same opportunity to an ESS for a comparable exemption from further compliance. A comparable exemption must be provided based on comparable procedures and criteria, to the extent they apply to an ESS and adjusted to reflect applicable differences between electricity service suppliers and electric companies.

2. Major Tasks

Section 1-15 creates several new PUC work streams and increases the scope of many current agency activities.

a. Preparing for Clean Energy Plans and ESS Reporting

The PUC will need to address many issues to prepare to the filing of Clean Energy Plans by PGE and PacifiCorp, and the reporting of information by ESSs. For IOUs, the PUC will need to adapt guidelines or adopt rules as necessary to allow the utilities to incorporate Clean Energy Plans into the existing IRP processes, as well as begin work to incorporate clean energy targets into utility planning and procurement activities already underway.

The current IRP and RFP schedules for PGE and PacifiCorp help provide some timeframes for this work:

- PacifiCorp filed its IRP ([LC 77](#)) in September 2021, with acknowledgement scheduled in March 2022. Under this schedule, PacifiCorp’s CEP would likely be filed during the second or third quarter of 2024.

With its IRP, PacifiCorp filed a request ([UM 2193](#)) to initiate a solicitation process for the acquisition of approximately 1,345 megawatts (MW) of new generating resources and 600 MW of energy storage resources targeting a commercial operation date on or before December 31, 2026.

- PGE currently plans to file its next IRP in the first quarter of 2022, with acknowledgement in July - September 2022. PGE has indicated that the CEP will be included as part of that IRP filing.

In pending docket [UM 2166](#), PGE has an all-source RFP to address the company’s 2025 forecasted capacity shortfall of roughly 500 MWs. PGE seeks renewable and non-emitting dispatchable resources with a commercial operation date on or before

December 31, 2024. The current schedule includes a PUC decision on the final draft RFP in December 2021, and a PUC acknowledgment of the final shortlist in June 2022.

For PacifiCorp, the PUC will also need to establish specialized rules or guidelines to adapt the multi-state IRP to include a focus on Oregon-only emissions, or establish processes for submittal and review of ancillary plans (Section 4(3)(b)).

Other activities focused on Clean Energy Plans filed by IOUs, the PUC will need to:

- Adopt resiliency guidelines and standards for the utilities to use when including the risk-based examination of resiliency opportunities in their clean energy plans required by Section 4(4)(c);
- Determine what additional factors, beyond those cited in Section 5(2)(f) that must be evaluated before acknowledging a Clean Energy Plan;
- Establish a process for PGE and PacifiCorp to contemporaneously recover the costs for work associated with the Community Benefits and Impacts Advisory Groups and the development of biennial reports (Section 6)

For the ESSs, the PUC will need to:

- Adopt rules to govern reporting processes and requirements;
- Determine what additional factors, in addition to those cited in Section 5(3)(c) that must be reported by an ESS;
- Adopt rules to comply with amendments to ORS 757.649 in Section 25 to require an ESS to publicly disclose a summary of the aggregated energy supply mix and associated emissions of the power sources that serve the direct access consumers

b. *Policy Considerations*

In addition to preparing for Clean Energy Plans and ESS reporting, the PUC may need to address other policy changes that affect existing areas of PUC responsibility or encourage new PUC ratemaking policy considerations.

- Incentives for Early Compliance: Section 12 may prompt utilities or stakeholders to ask the PUC to investigate whether performance incentives should be offered to electric companies for early compliance with the clean energy targets. Such an investigation will require legal and ratemaking policy analysis (including the PUC's ability, if any, to provide incentives to ESSs.)
- Interaction with other state/regional policies and market activities: The PUC will need to monitor and track how the carbon accounting and attribution policies will interact with other state and regional policies, as well as market activities. These include programs involving RECs such as RPS, voluntary products and green tariffs, renewable PURPA rates, and Low-Carbon Fuel Standards/Clean Fuels Program, where claims about the renewable and emissions reductions attributes of energy may be made by someone other than the utility that claims the emissions reductions attributes under this program

or may potentially be double-counted. Other regional activities, including possible interplay with Washington’s Clean Energy Transition Act, will need to be tracked.

- **Avoided Cost Updates**: Under Section 8(4)(a), the PUC must initiate a process for both PGE and PacifiCorp to update avoided costs calculated under ORS 758.525 to ensure they accurately reflect the characteristics of generators that contribute to compliance with the clean energy targets.²

c. *Plan Review and Acknowledgment; Review of ESS Information*

Once the Clean Energy Plans are filed and updated, the PUC will need to review them for compliance with identified requirements and adopted rules (if any). As noted, the plans must be acknowledged within six months.

The bill provides little guidance to the PUC with regard to actions the PUC must take in response to ESS reporting. Section 5(3)(d) provides only that the PUC must “review the information supplied by an electricity service supplier under this subsection for the purposes of determining whether the electricity service supplier is making continual and reasonable progress toward compliance with the clean energy targets set forth in section 3 of this 2021 Act.”

d. *Increased Resource Procurement and Program Development*

Upon acknowledgment of the Clean Energy Plans, the utilities will begin procurement activities identified in the plans, which may involve higher levels of resource procurement and/or development of new load flexibility and distributed resource programs.

e. *Compliance*

The first GHG emissions reduction target is 2030. To prepare for its compliance responsibilities, the PUC will need to complete certain activities prior to the first interim emission reduction review of 2030, and at that point perform new activities required under the sections below.

- **Unexpected Greenhouse Gas Emissions** (Section 8): The PUC will need to adopt policies/processes for coordination with the DEQ to support the evaluation of the conditions underlying any unexpected emissions when determining whether an electric company has met the 2030 Clean Energy Target.

² The PUC may begin these processes “no sooner than two calendar years before the calendar year identified in the electric company’s acknowledged IRP that shows the electric company will meet or exceed the requirements described in ORS 469A.052 (1)(h) and must conclude no later than the calendar year identified in the acknowledged IRP that shows the electric company will meet or exceed the requirements described in ORS 469A.052 (1)(h).” ORS 469A.052(1)(h) provides: “At least 50 percent of the electricity sold by an electric company to retail electricity consumers in the calendar year 2040 and subsequent calendar years must be qualifying electricity.”

- Reliability Pause (Section 9): The PUC will need to examine whether to adopt in advance any rules or guidelines for determining grounds and a process for granting temporary exemptions to electric companies due to system reliability concerns.
- Cost Cap (Sections 10/11): If necessary, the PUC is required to use a contested case proceeding to examine whether the cumulative rate impact of clean energy investments exceed a cost cap. To perform this review, the PUC will need to consider whether to establish advance guidelines or rules to determine with an investment is for the purpose of compliance with Sections 1 to 15, and the calculation of rate impacts associated with those investments.

The PUC will also need to determine the process to provide the same opportunity to an ESS for a comparable exemption from further compliance.

Customer Supported Renewables (Sections 20-24)

1. Summary

These sections allow governments and the utilities to file tariffs reflecting renewable and non-emitting energy goals to serve retail electricity consumers within the boundaries of those communities. “Government” is defined to include a city, county, irrigation district, ditch improvement district, water control district, or government of a federally recognized Indian tribe in Oregon.

Under these provisions, an electric company may file—in coordination with a government to meet adopted renewable and nonemitting energy goals—a program as part of a portfolio of rate options required under ORS 757.603 that reflect the cost to serve retail electricity consumers within the boundaries of those governments with electricity:

- Derived from new or existing renewable energy resources or nonemitting energy resources, including supply and demand-side resources, or
- Paired with unbundled renewable energy certificates, as defined in ORS 469A.005, from new or existing renewable energy resources.

The PUC may approve such a filing if the filing includes an attestation from the local government of coordination with the utility, and the government adopts an ordinance or other regulation that:

- Requires that retail electricity consumers within the boundaries of the government must be served with renewable energy resources or nonemitting energy resources;
- Gives the customers an opportunity to opt out;
- Contains certain provisions to allow customers with demand greater than 30 kilowatts to participate if the demand is due to EV related services;
- Contains protections, such as subsidies or bill payment assistance, for low-income consumers and provides that these protections are paid for solely by consumers within the boundaries of the government; and

- Sets forth the duration of the program

The electric company must also show it has minimized the shifting of costs from retail electricity consumers to other customers who do not participate, and must use PUC-approved procurement processes (if applicable) and any procurement criteria agreed to with the government.

Upon approval of a community supported renewables program, the electric company must receive approval from the government to proceed (if the government declines, the electric company must file to suspend the rates and charges under the program). Once governmental approval is received, the electric company must inform participating consumers of the program's costs and notice of any rate change. The electric company must also provide an annual report to the PUC and participating governments summarizing the program activities in the prior calendar year.

These provisions also require the PUC to allow a utility to recover the costs of the resources to serve the program, and to collect moneys from participating retail electricity consumers in excess of the cost of service and defer revenues or costs associated with the program to make future investments to serve program participants or to protect nonparticipating consumers should the government end its participation.

2. Major Tasks

Passage of these Community Supported Renewable provisions will likely result in multiple tariffs to implement new, large-scale, highly complex rate and product designs that have significant interaction with our IRP process and other regulatory efforts.

The PUC will need to undertake various actions to prepare for the filings. This work includes engaging with utilities and interested local governments to provide education, ensure transparency, and set expectations for PUC review of customer supported renewable tariffs. The PUC will need to address the manner in which the resources serving the new tariffs will be procured. This could entail a rulemaking or an investigation that considers novel approaches to resource procurement and the valuation of costs, risks, and benefits.

The PUC will need to determine processes or considerations related to the rate recovery of the resources acquired to serve the program. Issues to be addressed include:

- Methodology and process for determining rates (and adjusting rates) for participating customers within the allowed cost recovery practices in the statute;
- Timeline, process, and termination fees for customers declining enrollment, seeking later participation;
- Terms and conditions of agreements to minimize cost shifting and specific protections for low income customers

Other Provisions

1. Summary

In addition to the two primary sections relating to Clean Energy and Community Supported Renewables, HB 2021 contains several other significant provisions:

a. Responsible Labor Standards (Section 26)

This section establishes labor standards and conditions for those who construct or repower a large-scale project sited in Oregon. A “large-scale project” is defined as “a renewable energy generation, sequestration or storage facility with a capacity rating of 10 megawatts or greater.”

The standards require, prior to the contract finalization or energy delivery, the provision of a signed attestation or declaration stating their compliance with the labor standards. The documentation must be delivered to ODOE.

b. Study on Small Scale Renewable Energy Projects (Section 18)

ODOE must convene a work group to examine opportunities to encourage development of small scale and community-based renewable energy projects in this state that contribute to economic development and local energy resiliency. The work group must include various required representatives, including an individual that represented the PUC.

The work group must examine:

- Potential barriers to project development in both IOU and COU service territory;
- Potential economic benefits of small-scale renewable energy projects;
- Potential contributions of small-scale renewable energy projects to local energy;
- Access and ownership opportunities for low-income communities, BIPOC communities, tribal communities and rural and coastal communities with limited infrastructure;
- Opportunities for diverse models of ownership by local governments, nonprofit organizations and cooperatives of community members;
- Potential rate impacts; and
- Potential legislation that could encourage development of small scale and community-based renewable energy projects in this state

Members of the work group must comply with requests from ODOE for data related to the work group’s study. ODOE is required to submit a report by September 30, 2022.

c. Community Renewable Energy Project Grant Program (Sections 29-35)

A \$50 million Community Renewable Investment Fund is created for investments in community renewable energy projects. ODOE will administer the grant program for the purpose of offsetting the costs of planning and developing community renewable energy projects, promoting small-scale renewable energy projects, and providing direct community benefits across the state.

ODOE may appoint an advisory committee to help provide advice on the implementation of the program, and section 32 identifies specific members of such committee. The PUC is not identified as a required member.

d. Miscellaneous Provisions

Section 36 amends ORS 469A.210 to increase the small-scale renewable energy project requirement for PGE and PacifiCorp from 8 percent to 10 percent capacity by 2030.

Section 28 prohibits the Energy Facility Siting Council from siting any new generation facility that produces power from fossil fuels or to amend a certificate that would significantly increase carbon dioxide emissions from an existing facility.

2. Major Tasks

The responsible labor standards sections should not require any PUC work load – but rather places responsibility on entities that develop or repower large scale projects.

The PUC will serve as a representative on the work group to support ODOE’s study on opportunities for small scale and community-based renewable energy projects. The PUC will likely be asked to provide data related to the work group’s study.

The PUC has no identified role in the Community Renewable Investment grant program administered by ODOE.

The PUC will need to take action to implement the change to ORS 469A.210 to increase the small-scale renewable energy project requirement from 8 percent to 10 percent capacity by 2030.

Fiscal Impacts

The PUC reported a fiscal impact of 6.5 FTE positions, broken down as follows:

	Limited Duration	Permanent	Total
UA 3	2.25	2.75	5.0
ALJ	0.5	0.75	1.25
Support (AS2)		0.25	0.25
Expenses			\$235,000
Total	2.75	3.75	6.5 FTE \$235,000

Implementation Plan

HB 2021 creates significant PUC activities to implement the bill’s various provisions. The PUC has identified seven near-term work streams, which are generally represented on the attached

Gantt chart (with the exception of changes required to utility tariff and direct access charges, addressed below). The PUC will revisit the implementation activities and adjust as needed.

The seven key implementation activities are as follows:

1. Planning:

The PUC will need to take three near-term actions to integrate the CEP process with existing and on-going utility planning and procurement activities. First, the PUC will open an investigation to examine how best to integrate the IRP/RFP/CEP process to be most efficient and effective under rapid decarbonization and other transformative policies. The investigation will consist of technical and policy workshops, followed by PUC Staff straw proposals, comment opportunities, and PUC public meetings to adopt interim guidance. Second, the PUC will need to develop standards and guidance for risk-based resiliency analysis, and is seeking USDOE resources to support this effort. Third, following initial work, the PUC will launch a subsequent investigation (potentially a rulemaking) to revise IRP/RFP/CEP guidance following first IRP/CEP filing.

2. Compliance:

Given that compliance requirements begin in 2030, the PUC has identified no need to focus near-term resources on compliance-related actions, but will monitor utility actions and related impacts on reliability and costs, and take actions as appropriate. Given the uncertainty of actions to be taken by the IOUs to meet the emission reduction targets, the status of regional and state resource adequacy discussions, and the status of other unknowns such as multi-state protocol agreements, the PUC believes it is premature to address questions related to the implementation of cost or reliability off-ramps (e.g., how to attribute investments to HB 2021 and what methodology to use for the cost cap).

If reliability or cost issues are raised in the near-term, the PUC will respond by initiating the processes identified in the bill. Other PUC activities and utility filings, such as IRPs, RFPs, and resource adequacy showings, will help inform these issues.

3. Direct Access:

The PUC has bifurcated docket [UM 2024](#) to address HB 2021 implementation issues related to direct access in the near-term. The first phase is a rulemaking that will address HB 2021 reporting (planning, continual progress, compliance, off ramps), non-bypassability framework, and other competitive matters. The second phase will be a contested case to examine HB 2021 considerations not captured in Phase 1 through examination of transition charges, caps, etc. Following the completion of both phases in UM 2024, the PUC will open a rulemaking to update [OAR 860 Div 038](#) as necessary.

4. Customer & Community Benefits:

The PUC Staff will soon convene workshops followed by utility tariff filings to establish mechanisms for contemporaneous recovery of costs for the Utility Customer Benefits and Impacts Advisory Group (UCBIAG). Early next year, PUC Staff will initiate a process on UCBIAG policies, including scoping, discussion of participants, meetings, reasonable costs, clarifying

timing of biennial reports, with PUC formal action as necessary. This process will begin with utility proposals for UCBIAG scope and participation followed by workshops.

In addition, the pending [AR 622](#) rulemaking will implement the renewable energy project standard outlined in ORS 469A.210 and Section 37 of HB 2021, and will conclude by end of 2021. The PUC will also appoint a representative to the ODOE study required in Section 18 of HB 2021, and determine actions required after release of findings in September 2022.

5. Customer Supported Renewables:

The PUC Staff will establish a working group to discuss tariff principles, review data, and provide educational resources for interested local governments and other parties. The focus of the near-term PUC process will be education, transparency, and setting expectations for PUC review of customer supported renewable tariffs. The PUC has filed an application for a USDOE Solar Innovators fellow to support this effort.

Although this planning effort will continue throughout next year, the PUC will respond to customer supported renewable tariffs as filed – even those submitted prior to 2023. The PUC, however, will be best prepared to most effectively and efficiently address filings made after the completion of near-term working group process, such as guidance about mitigating the impacts of community programs on energy burdened customers, as well as allow broader coordination and consideration of impacts across Oregon communities.

In 2024, the PUC will open a rulemaking to update portfolio options policies found in [OAR 860-038](#) as necessary. This will include implementation of customer supported renewables provisions, incorporation of HB 2021 Sections 20 and 21, as well as other potential activities, such as the intersection of the UCBIAG with the Portfolio Options Committee.

6. Interaction with state and regional policies:

Following initial planning work discussed above, the PUC will complete the [AR 616](#) RPS Implementation Plan rulemaking to address storage in the Renewable Adjustment Clause (RAC) and to streamline Renewable Portfolio Implementation Plans (RPIPs). Throughout, the PUC will monitor intersection of HB 2021 with other state and regional policies, including the renewable portfolio standards, Washington's Clean Energy Transition Act (CETA), and regional market activities. The PUC has not prioritized near-term actions on specific investigations, such as guidance for Renewable Energy Credit (REC) attribution post-2030 compliance or HB 2021 required avoided cost updates in Section 8(4).

7. Other Elements:

PUC will address and take action as required and consistent with HB 2021 provisions governing required labor standards and siting restrictions.