

RESOLUTION No. 31218

Bruce Q. Harrell

A RESOLUTION relating to the City Light Department; endorsing the City Light Department's Environmental Attributes Management Policy and establishing it as the policy governing wholesale transactions with respect to Renewable Energy Credits and greenhouse gas offsets within the utility in order to facilitate compliance with city, state, and potentially federal, requirements.

6/2/2010 *Aye* BH, NL

Introduced: <i>May 24, 2010</i>	By: <i>Harrell</i>
Referred:	To: Energy, Technology, and Civil Rights
Referred:	To:
Reported:	
Passed: <i>6.7.10</i>	Signed: <i>6.10.10</i>
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6.7.10 Adopted 9-0

438-0818

LAW DEPARTMENT

RESOLUTION 31216

1
2 A RESOLUTION relating to the City Light Department; endorsing the City Light Department's
3 Environmental Attributes Management Policy and establishing it as the policy governing
4 wholesale transactions with respect to Renewable Energy Credits and greenhouse gas
5 offsets within the utility in order to facilitate compliance with city, state, and potentially
6 federal, requirements.

7 WHEREAS, in order to both comply with regulatory mandates and maintain the City Light
8 Department ("City Light") as a carbon-neutral utility in a cost-effective manner, City
9 Light routinely buys and sells Renewable Energy Credits ("RECs") and greenhouse gas
10 offsets ("GHG offsets"); and

11 WHEREAS, City Light's participation in wholesale environmental attributes markets is a
12 necessary adjunct to its involvement in wholesale energy markets and necessarily exposes
13 City Light to risk, including market and credit risk; and

14 WHEREAS, the utility industry Best Practices require that City Light have a clear and binding
15 statement of policy to govern the management of those risks specific to the environmental
16 attributes necessary to facilitate compliance with all regulatory requirements; and

17 WHEREAS, the City Light Risk Oversight Council has reviewed and approved the proposed
18 policy; and

19 WHEREAS, the utility industry Best Practices further require that such policies be endorsed by
20 City Light's governing body; NOW, THEREFORE,

21 **BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEATTLE, THE**
22 **MAYOR CONCURRING, THAT:**

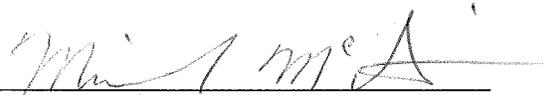
23 Section 1. The Environmental Attribute Management Policy as developed by City Light's
24 management and attached hereto as Exhibit A is endorsed by the City Council and is established
25 as the City of Seattle's policy governing the management of City Light's REC and GHG offset
26 portfolio.



1 Adopted by the City Council the 7th day of June, 2010, and
2 signed by me in open session in authentication of its adoption this 7th day
3 of June, 2010.

4 
5 _____
6 President _____ of the City Council

7 THE MAYOR CONCURRING:

8 
9 _____
10 Michael McGinn, Mayor

11 Filed by me this 11th day of June, 2010.

12
13 
14 _____
15 City Clerk

16 (Seal)

17
18 Exhibit A: Environmental Attributes Management Policy
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Robert Cromwell/MLS
SCL Environmental Attributes Management Policy RES Exhibit A
April 2, 2010
Version #2

EXHIBIT A

SEATTLE CITY LIGHT

Environmental Attributes Management Policy



April 5, 2010

Mayoral and Council REVIEW DRAFT

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1. Introduction

Seattle City Light faces significant uncertainty regarding both the quantity of renewable energy available to the utility, customer needs, and the range of prices prevailing in the wholesale power market. The renewable energy owned or acquired by City Light has environmental attributes that have economic and/or social value. The policies outlined below are designed to establish the framework for City Light to manage the risks associated with the environmental attributes of Renewable Energy Credits (“REC”), Greenhouse Gas Offsets (“GHG Offset”), and possible future carbon allowances, and associated markets. A REC reflects a bundle of environmental attributes such as avoided emissions of sulfur oxides, nitrogen oxides, carbon dioxides, etc. A GHG offset is a certificate that documents the exchange of money for the reduction of GHG emission from a specific project, commonly one metric ton of carbon dioxide. A REC can be used for meeting regulatory compliance requirements or as a GHG Offset, but a GHG Offset cannot be used as a REC. These policies specify: a risk limit; a set of rules to guide decisions concerning the purchase and sale of RECs and GHG Offsets, other environmental attributes, the use of RECs as GHG Offsets and a clear statement of roles and responsibilities of City Light’s Divisions and personnel.

1.1. AUTHORITY

The City Light Department of the City of Seattle (“City Light”) operates under the authority of the Mayor and City Council of the City of Seattle (“City”). City Light is charged by the City with operating its power supply resources, transmission agreements and electric system to meet the power needs of its customers.

Currently there is federal legislation pending which would establish a federal renewable portfolio standard and another that would create a carbon “cap & trade” program that may require City Light’s participation in a carbon auction and secondary sales market.

The Mayor’s 2006 Climate Action Plan and City Council Resolutions direct City Light to meet load growth with conservation and renewables, and set a goal of Net Zero Green House Gas emissions.

The Western Climate Initiative (WCI), of which the state of Washington is a member, sets regional goals for GHG and rules on out of regions power imports and off-sets.

RCW 19.29A.090 requires City Light to offer its customers the voluntary option of purchasing energy from qualified alternative energy sources. City Light does so through its “Green Up” program.

Chapter RCW 19.285 (“I-937”) created a renewable portfolio standard (“RPS”) in Washington that requires City Light to acquire new renewable resources to meet a certain percentage of its customer’s energy requirements.



1.2. SCOPE

This Environmental Attribute Management Policy applies to all short and long term purchases, sales, exchanges and banking of RECs, other environmental attributes such as GHG Offsets or carbon offsets for compliance with City policies and ordinances, state laws and possible federal laws.

1.3. PURPOSE

The purpose of this Environmental Attributes Management Policy is to formally establish a Wholesale Environmental Attributes program and document the context for organizational structure (Appendix A) utilized by City Light to meet the regulatory requirements with which Seattle City Light must comply. This Policy recognizes that there is an interrelationship between the existing Wholesale Energy Risk Management Policy and this Policy. Actions taken regarding City Light's REC and GHG position can affect its energy sales and purchases; and vice versa.

All City Light employees in relevant functional areas are expected to comply with, and acknowledge their understanding of the Environmental Attributes Management Policy as it applies to their current position at City Light.

2. ORGANIZATION & GOVERNANCE

2.1. ROLE OF THE POWER CONTRACTS AND RESOURCE ACQUISITION DIVISION (PCRA)

The PCRA is led by the Director of Power Contracts and Resource Acquisition. The Division manages the long-term contract portfolio and procures new, renewable resources on behalf of City Light. It transacts in the nascent REC and GHG Offsets markets as needed to balance the supply of environmental attributes to maintain compliance with City policies, state law and potential federal law, subject to the limitations established by this Environmental Attribute Management Policy.

2.2. POWER CONTRACTS AND RESOURCE ACQUISITION DIVISION RESPONSIBILITIES

The responsibilities of the PCRA include:

- Meeting City Light's customer energy requirements by managing long-term contracts and acquiring new resources consistent with City Light's Integrated Resource Plan, City policies, state law, and federal law;
- Extracting value from City Light's environmental attributes portfolio with due consideration of risk and complying with all regulatory and contractual requirements;



- Formulating and recommending resource acquisition and environmental attribute risk mitigation strategies to the Risk Oversight Council (“ROC”) that are consistent with City Light’s objectives and this Environmental Attribute Management Policy;
- Implementing strategies approved by the ROC; and,
- Other activities relevant to the management of City Light’s long-term contracts and environmental attributes portfolio.

2.3. POWER CONTRACTS AND RESOURCE ACQUISITION DIVISION REPORTING RELATIONSHIP

The Power Contracts and Resource Acquisition Director reports directly to the Power Supply and Environmental Affairs Officer of City Light.

2.4. ENVIRONMENTAL ATTRIBUTE MANAGEMENT POLICY APPROVALS AND AMENDMENTS

This Environmental Attribute Management Policy will become effective upon the expressed approval of the City. Each year prior to July 1, the ROC will review the elements of this policy and present any recommended changes to the Superintendent. In reviewing the policy and recommending modifications, the ROC will consider any material changes in laws, in the nascent environmental attributes markets in which City Light transacts, in City Light's business activities and in the financial circumstances of the utility. Recommendations shall include a complete description of the reason for such changes and their anticipated impact.

2.5. COMPLIANCE WITH LAWS AND REGULATIONS

Employees shall comply with all applicable laws and regulations including, but not limited to, Anti-Market Manipulation rules established by Congress and the Federal Energy Regulatory Commission. Employees should be familiar with the relevant laws and regulations and seek clarification from the City’s legal department as required. The City's legal department shall maintain up-to-date legal and regulatory guidelines that govern the purchase and sale of all authorized products, and train employees as needed. However, it shall remain City Light’s responsibility to ensure that its employees are adequately trained.

2.6. MISREPRESENTATION & CONFLICT OF INTEREST

City Light personnel shall not withhold or conceal information regarding transactions or risk management activities from any person responsible for the accurate recording and reporting of such activities, nor shall they misrepresent any such information.

Employees shall always put the interests of City Light ahead of any interest they may have in entities with which they transact. Further, employees authorized to place or execute environmental attribute transactions on behalf of City Light may not engage in such activities for their personal accounts. Employees will disclose to their supervisor any interest in an entity that



could reasonably be construed as preventing them from acting solely in the interests of City Light. Failure to do so is a violation of this Policy.

2.7. POLICY VIOLATIONS

All persons engaged in the implementation, management, or administration of these policies will sign the Statement of Compliance (see Appendix B), stating that they have read, understood and agree to comply with them.

Any person found in direct violation of these policies may be subject to disciplinary action, including possible termination, at the discretion of the ROC.

3. Risk Management Approach to Environmental Attributes

3.1. RISK MANAGEMENT PHILOSOPHY

City Light's current environmental attributes portfolio consists of the RECs associated with its owned and contracted for resources, and those RECs and GHG Offsets purchased in the market. The characteristics of these environmental attributes are determined variously by contract, by state laws, and as may be determined by federal law in the future. City Light seeks to meet the Mayor and City Council's policy objectives of maintaining City Light as a Net Zero GHG emissions utility, and comply with state law and foreseeable federal law, through the allocation of the environmental attributes it possesses to provide our retail customers carbon-neutral energy and to remain carbon neutral as an entity providing electric service to our customers. City Light recognizes that the risks associated with our environmental attribute portfolio is significantly less than the risks associated with our wholesale energy marketing.

To manage the risks associated with the potential for a shortfall in available environmental attributes and to respond to then-existing market conditions, City Light will, from time to time, acquire renewable resources that generate RECs and purchase RECs in advance of the specific trigger dates. City Light will manage its portfolio of available environmental attributes in a way that generates additional value from its environmental attribute portfolio when they are temporarily in advance of City Light's forecast needs, with due consideration of risk.

Currently, City Light is managing a portfolio of RECs and GHG Offsets. By entering into bilateral agreements and participating in the short-term and illiquid environmental attributes market City Light is exposed to risks similar to those faced in the wholesale energy market. However, the regulatory requirements for environmental attributes are annual in nature, thus creating a lower risk of either financial exposure or regulatory non-compliance. City Light needs to manage, a variety of risks including:

- Market price risk – the risk of loss due to price changes;



- Credit/performance risk – the risk of loss due to default or failure to perform on contracts by counterparties;
- Volumetric risk – the risk of loss due to unpredictable variations in the output of the underlying resource(s) producing the environmental attribute;
- Modeling risk – the risk of loss due to a model’s failure to match reality sufficiently well;
- Operations risk - the risk of loss due to physical assets failing to perform; and,
- Operational (Commercial) risk – the risk of loss due to flawed or inadequate business processes.

3.2. MARKET RISK POLICIES

The following market risk policies shall govern City Light’s participation in environmental attributes markets.

- City Light will meet the Mayor’s Climate Action Plan GHG neutrality goal with a high level of certainty and comply with state and federal law regarding the environmental attributes associated with its portfolio.
- City Light will ensure that it has full knowledge of its position in all transacted environmental attribute products and the resulting exposure.
- Only personnel authorized by the Superintendent can transact on behalf of City Light in the environmental attribute markets.
- City Light may only transact within limits approved by the ROC. The limit structure shall be based on parameters such as volume, timing, and/or risk metrics, as deemed appropriate by the ROC.
- Metrics for assessing City Light's environmental attribute market risk exposure will be specified, measured, monitored and reported on a quarterly basis.
- Models and inputs for valuation and risk measurement shall be subjected to a validation and change control process.

3.3. STRATEGIES AND PLANS

In order to provide a high degree of assurance of meeting the Mayor’s Climate Action Plan and to assure compliance with state and federal law City Light will plan towards having adequate environmental attributes for a given calendar year, or other term as changes in state or federal law may require. The Power Contracts and Resource Acquisition Division, in concert with the ROC, will develop annual strategies with underlying plans as a means to manage the risks faced by the utility of failing to meet its environmental attributes requirements. Doing so will require the Environmental Affairs Division and the Integrated Resource team of City Light to establish the



anticipated need for environmental attributes for the coming year and for the Conservation Resources Division to establish the anticipated need for qualified alternative energy sources for the coming year. The methodology, timing, and frequency by which each of these divisions does so shall be determined by the Power Supply and Environmental Affairs Officer.

3.4. ENVIRONMENTAL ATTRIBUTE MANAGEMENT AND EXECUTION

The Power Contracts and Resource Acquisition Division will manage City Light's environmental attribute position and execute all commercial transactions on behalf of City Light to assure the utility will be in compliance with then current state and/or federal requirements.

3.5. TRANSACTION TYPES

Seattle City Light shall be authorized to transact short term and long term purchases, sales, exchanges, and the banking of RECs, whether bundled with energy or without consistent with these Policies.

- **RECs:** Renewable Energy Credits are the environmental attributes associated with renewable generating resources that qualify under RCW chp. 19.285 and which may be registered with the Western Renewable Energy Generation Information System (WREGIS).
- **GHG Offsets:** GHG Offsets are certificates or memorandums that document the exchange of money for the reduction, avoidance, or sequestration of GHG emissions from a specific project. Unless stated otherwise, one GHG Offset represents the reduction of one metric ton of carbon dioxide or its equivalent in other greenhouse gases.

3.6. REC REGISTRATION & ENVIRONMENTAL CLAIMS BASED ON RECS

WREGIS is an independent, renewable energy tracking system selected by the Washington state Department of Commerce to support compliance with RCW chapter 19.285. WREGIS creates renewable energy certificates from renewable generation that is registered by its operator or owner. WREGIS RECs will be used by Seattle City Light to assure compliance with state law and possible, future federal law.

Seattle City Light will register those generation resources it owns or has under contract (or assure that its counter-party has registered its generation) which will allow it to verify its compliance with I-937.

3.7. CREDIT RISK MANAGEMENT

As the nascent markets develop for environmental attributes and the manner in which City Light participates in them gets better defined, credit risk will be assessed as part of the normal recurring transacting process.

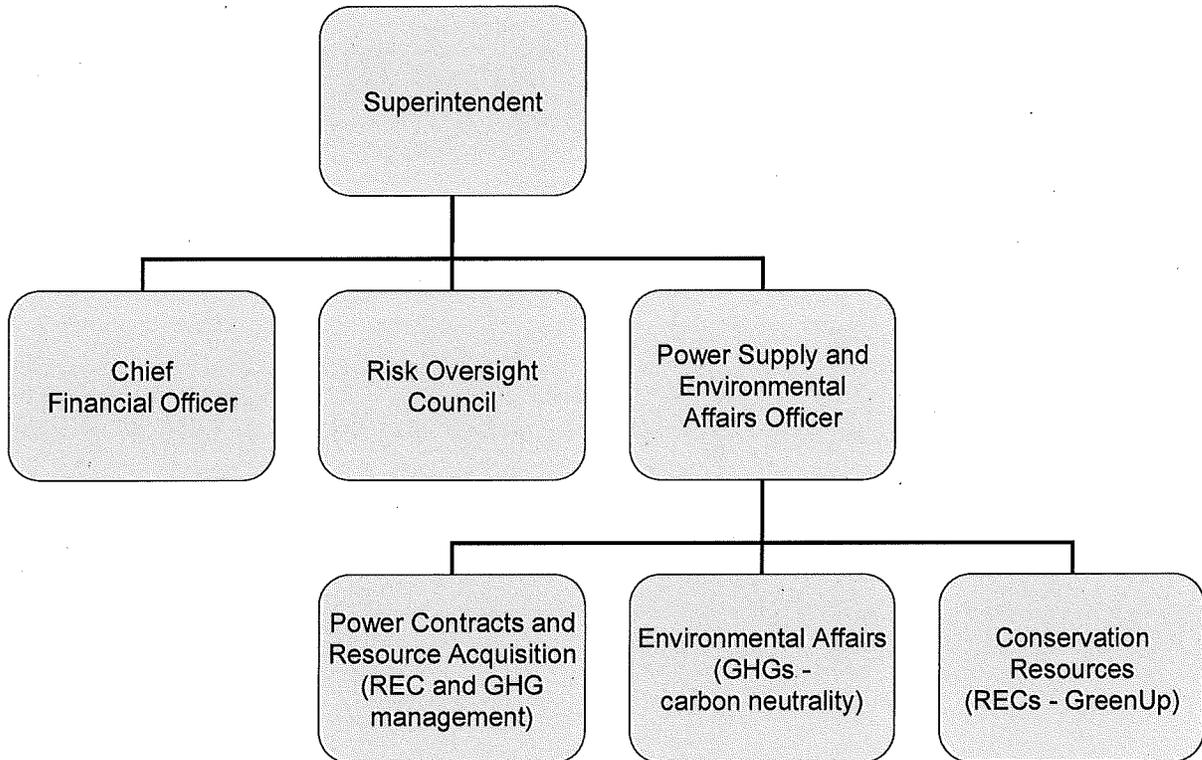


3.8. RISK REPORTING

A quarterly position report will be produced by the Power Contracts and Resource Acquisition Division and presented to the ROC on a quarterly basis for its review and approval (appendix C – Sample REC Position Report) two weeks after the end of each quarter.



Appendix A City Light's Environmental Attributes Management Organization Chart



Appendix B Compliance Statement

Compliance Statement

The undersigned employee hereby acknowledges receipt and review of City Light's Environmental Attribute Management Policy dated _____.

The undersigned further acknowledges that this policy defines the standards of City Light's environmental attribute management efforts that the employee is expected to comply with, and that failure to comply with these Policies may result in, among other things, disciplinary action up to and including termination.

Acknowledged by:

Employee Name (Print)

Employee Signature

Date



Appendix C Sample REC Position Report

Seattle City Light's Quarterly REC Position Report (12/16/2009)

		Expected Case (MWh)							
Sources of RECs		2009	2010	2011	2012	2013	2014	2015	2016
Wind:									
1	Stataline*	360,000	412,532	412,532	412,532	412,532	412,532	412,532	412,532
Biomass/Blogas:									
2	Burlington Biomass (SPI)	26,779	26,779	26,779	26,853	26,779	26,779	26,779	26,853
3	Columbia Ridge Landfill Gas**	2,160	50,458	50,458	50,596	50,458	50,458	50,458	50,596
4	Total Existing RECs	388,940	489,769	489,769	489,980	489,769	489,769	489,769	489,980
New RECs									
5	Gorge Tunnel	0	0	0	0	0	0	35,056	35,136
6	WestPoint	0	0	0	0	29,200	43,800	43,800	43,800
7	Market Purchases	0	0	0	0	0	0	0	0
8	Total RECs	388,940	489,769	489,769	489,980	518,969	533,569	568,625	568,916
9	RECs Allocated to Load	306,614	374,328	387,257	-	-	-	-	-
SCL Uses of RECs									
10	RPS I-937 requirement beg. 2012	0	0	0	306,720	309,043	311,656	313,775	952,138
11	Total RECs Used	306,614	374,328	387,257	306,720	309,043	311,656	313,775	952,138
Summary									
12	RECs to Load or for RPS	306,614	374,328	387,257	306,720	309,043	311,656	313,775	952,138
13	RECs Surplus to Load and RPS	82,326	115,441	102,512	183,260	209,926	221,913	254,850	(383,221)
14	Sold to Green Up	81,000	0	0	-	-	-	-	-
15	Net RECs Position	1,326	115,441	102,512	183,260	209,926	221,913	254,850	(383,221)
16	Expected Prices (\$/RECs)	\$7.00	\$7.35	\$7.72	\$15.10	\$15.86	\$16.65	\$17.48	\$18.36
17	Total RECs Available (\$)	\$9,283	\$848,488	\$791,136	\$2,767,842	\$3,329,122	\$3,695,173	\$4,455,807	(\$7,035,274)

* Updated based on actual (12/15/09)

** Start 12/16/09

Explanation of Data in Quarterly REC Position Report

- 1 Expected Stataline generation based on 27% capacity factor (0.27*175=47.1 MW)
Source Data provided to WCI by FPL, 412,532 RECs (expected annual generation * SCL's share)
- 2 Burlington (SPI) Everett plan an average of 3 MW delivered to SCL Plus Losses of 1.9%
- 3 Columbia Ridge Landfill Gas, 5.8 MW, Expected starting Nov. 10th, 2009
- 4 Total Existing RECs -- Sum of lines 1, 2, and 3
- 5 Gorge Tunnel starting in 2015 for 4 MW hydro efficiency gains
- 6 WestPoint sewage treatment Plant (metro) starting May 2013 expected double RECs of 5 (2.5*2) MW
- 7 Market Purchases (placeholder for future market purchases of RECs)
- 8 Total New RECs - Sum of lines 4, 5, 6, and 7
- 9 RECs Allocated to load (0.80*Total RECs). The 0.80 is based on load and portion of total resource.
This changes based on the water condition and load growth which is applicable only through 2011
- 10 RPS I-937 requirement - Renewable Portfolio Standard start in 2012 with 3% of net load to 9% in 2016
- 11 Total RECs Used is line 8 minus line 9 and line 10
- 12 RECs to Load or for RPS is the sum of lines 9 and 10
- 13 RECs surplus to Load and RPS is line 8 minus line 12
- 14 RECs Sold to Green-up
- 15 Net RECs Position is line 13 minus line 14
- 16 Expected price of RECs in Washington as of the date of this report noted above
- 17 Expected dollar value of RECs available -- line 15* line 16



FISCAL NOTE FOR NON-CAPITAL PROJECTS

Department:	Contact Person/Phone:	DOF Analyst/Phone:
City Light	Robert Cromwell/4-3856	Calvin Chow/4-4652

Legislation Title:

A RESOLUTION relating to the City Light Department; endorsing the City Light Department's Environmental Attributes Management Policy and establishing it as the policy governing wholesale transactions with respect to Renewable Energy Credits and greenhouse gas offsets within the utility in order to facilitate compliance with city, state, and potentially federal, requirements.

• **Summary of the Legislation:**

The legislation adopts an Environmental Attributes Management policy document.

• **Background:** *(Include brief description of the purpose and context of legislation and include record of previous legislation and funding history, if applicable):*

City Light has established a REC and GHG offset portfolio by virtue of its purchase of renewable generating resources, and REC-only and GHG offset purchases in the wholesale market. The RECs are necessary to meet certain legislative requirements and the GHG offsets are necessary to meet certain policy objectives. To the extent not necessary to meet regulatory requirements, the surplus RECs may be sold to reduce the net expense of regulatory compliance to City Light's ratepayers. The purchase and sale of the RECs and purchase of GHG offsets exposes City Light to a certain amount of risk. This Environmental Attributes Management Policy establishes the framework for City Light to manage these risks and those of possible future carbon allowances.

• *Please check one of the following:*

X **This legislation does not have any financial implications.** *(Stop here and delete the remainder of this document prior to saving and printing.)*





City of Seattle
Office of the Mayor

May 18, 2010

Honorable Richard Conlin
President
Seattle City Council
City Hall, 2nd Floor

Dear Council President Conlin:

I am pleased to transmit the attached Resolution that endorses Seattle City Light's Environmental Attributes Management Policy and establishes it as the policy governing wholesale transactions for Renewable Energy Credits, greenhouse gas offsets and possible future carbon offsets.

This policy allows Seattle City Light to effectively manage its portfolio of Environmental Attributes to meet legislative requirements and policy objectives while minimizing cost to the utility's ratepayers.

Thank you for your consideration of this legislation. Should you have questions, please contact Robert Cromwell at 206-684-3856.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael McGinn'.

Michael McGinn
Mayor of Seattle

cc: Honorable Members of the Seattle City Council

Michael McGinn, Mayor
Office of the Mayor
600 Fourth Avenue, 7th Floor
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Seattle, WA 98124-4749

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STATE OF WASHINGTON – KING COUNTY

--SS.

256198
CITY OF SEATTLE, CLERKS OFFICE

No.

Affidavit of Publication

The undersigned, on oath states that he is an authorized representative of The Daily Journal of Commerce, a daily newspaper, which newspaper is a legal newspaper of general circulation and it is now and has been for more than six months prior to the date of publication hereinafter referred to, published in the English language continuously as a daily newspaper in Seattle, King County, Washington, and it is now and during all of said time was printed in an office maintained at the aforesaid place of publication of this newspaper. The Daily Journal of Commerce was on the 12th day of June, 1941, approved as a legal newspaper by the Superior Court of King County.

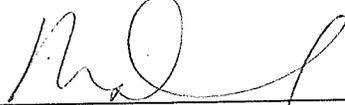
The notice in the exact form annexed, was published in regular issues of The Daily Journal of Commerce, which was regularly distributed to its subscribers during the below stated period. The annexed notice, a

CT:31216,31218-19 TITLE

was published on

06/15/10

The amount of the fee charged for the foregoing publication is the sum of \$ 54.60, which amount has been paid in full.



Subscribed and sworn to before me on

06/15/10



Notary public for the State of Washington,
residing in Seattle

Affidavit of Publication

State of Washington, King County

City of Seattle

TITLE-ONLY PUBLICATION

The full text of the following ordinances, passed by the City Council on June 7, 2010, and published here by title only, will be mailed upon request, or can be accessed at <http://clerk.ci.seattle.wa.us>. For further information, contact the Seattle City Clerk at 684-8344.

RESOLUTION 31216

A RESOLUTION relating to the City Light Department; endorsing the City Light Department's Environmental Attributes Management Policy and establishing it as the policy governing wholesale transactions with respect to Renewable Energy Credits and greenhouse gas offsets within the utility in order to facilitate compliance with city, state, and potentially federal, requirements.

RESOLUTION NO. 31218

A RESOLUTION requesting the City Light Department to submit annual reports on its progress in implementing recommendations in the March 2010 performance audit report by the Washington State Auditor's Office, and asking the Office of the City Auditor to develop a proposal for future periodic performance audits of the department.

RESOLUTION NO. 31219

A RESOLUTION relating to the City Light Department; adopting the recommendations of Energy and Environmental Economics Inc., on the preferred protocols and documentation to be used by City Light when proposing significant distribution capital projects to the City Council.

Publication ordered by the City Clerk
Date of publication in the Seattle Daily
Journal of Commerce, June 16, 2010.

6/16(256198)