Comments of Climate Solutions on the Washington Utilities and Transportation Commission Rulemaking Regarding Proposed Revisions to Electric and Gas Least-Cost Planning Rules

Submitted by Rhys Roth, Co-Executive Director, Climate Solutions May 13, 2005

Docket No. UE-030311, electric least-cost planning (WAC 480-100-238), UG-030312, gas least-cost planning (WAC 480-90-238)

Thank you for the opportunity to provide comments on behalf of Climate Solutions with regards to the draft least-cost planning rules. Climate Solutions fully supports the detailed comments provided by the Northwest Energy Coalition and we support the updating of these rules.

We strongly support the Coalition's emphasis in several places in their comments on the importance of thorough and transparent evaluation of alternatives means of meeting distribution and transmission system needs. Smart grid technologies hold significant promise for lowering utility costs, increasing reliability, and delivering additional societal benefits.

Climate Solutions is a non-profit organization (www.climatesolutions.org) working to help the Pacific Northwest to be a world leader in practical, profitable solutions to global warming. We are coordinating a coalition of stakeholders that has identified smart energy as one of the region's most significant economic development opportunities. These stakeholders have spent several months studying the benefits of and barriers to wider infusion of smart grid technologies into the electric grid. This research strongly supports the Northwest Energy Coalition's comments.

We look forward to being of assistance to the WUTC rulemaking deliberations.