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December 20, 2019

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

RE: Docket UE – 190698, Relating to Integrated Resource Planning

Dear Mr. Johnson and Commissioners:

King County and our partners, the cities of Burien, Kenmore, Kirkland, Mercer Island, Shoreline, and Snoqualmie, are commenting jointly on Docket UE – 190698, which proposes to significantly change the process and requirements for regulated utilities' Integrated Resource Plans. We are providing these comments as elected officials representing more than 500,000 Washington residents, many of whom are Puget Sound Energy customers.

Confronting climate change and accelerating a transition to a clean energy economy is a shared priority for our jurisdictions. Through the Growth Management Planning Council, King County and all 39 cities within the county have established shared, formal targets to reduce greenhouse gas emissions by at least 50 percent by 2030 and 80 percent by 2050. As members of the King County-Cities Climate Collaboration (K4C), we have developed sector-specific commitments to meet these targets. One policy commitment seeks to support and build on Washington State's Renewable Portfolio Standard and the Clean Energy Transformation Act by partnering with utilities, regulators, and community stakeholders to ensure that future energy needs are met through deep energy efficiency investments, improved management of peak demands, and renewable energy, while phasing out fossil fuel-based generation.

We appreciate the opportunity to comment on the Docket, and would like to emphasize our interests in increasing transparency, accountability, and stakeholder involvement in the planning process. We would also like to better understand barriers to equitable and

accelerated implementation of clean energy resources, and seek to work collaboratively with Puget Sound Energy (PSE) and the Utilities and Transportation Commission (UTC) to overcome them.

- **IRP Process:** We acknowledge the substantial amount of time and energy the development and review of an Integrated Resource Plan (IRP) requires from utilities and the UTC. We support staff's recommendation to extend the timeline to file an IRP to once every four-year period, and to require a progress report every two years, providing that the process and outcomes are fully transparent, and utilities are held accountable to the goals of the Clean Energy Transformation Act. We specifically support a review of the major assumptions of the IRP, including projected demand, projected conservation, and resource costs.

We strongly support public participation in the IRP process, and encourage the utilities, UTC, and stakeholders to develop guidance that ensures a robust and constructive dialog during the development of the IRP. We encourage a framework that provides for adequate time for stakeholder input, utility evaluation of stakeholder input, and utility responses for how the input may be incorporated into the plan.

- **Equitable distribution of benefits:** Ensuring that clean energy solutions are made in concert with highly-impacted communities and workers is a priority for the K4C. We seek clear reporting from utilities that demonstrates the utilities' work in this area; for example, utilities could report the distribution of efficiency incentives or load management solutions by income level, or investments in transportation electrification by geography.
- **Content of the IRP:** We recommend the development of clear and consistent guidelines for the presentation of data and supporting narrative in the IRP, especially with respect to the application of the social cost of carbon and resource adequacy metrics. The K4C's shared action commitments prioritize energy efficiency and demand response and management programs to minimize the need for additional generation. We seek transparency on utilities' assumptions and methodologies so that we can collaboratively work towards this goal.

The King County-Cities Climate Collaboration has successfully collaborated with Puget Sound Energy on several initiatives, including Green Direct, which will supply renewable electricity to ten K4C partners, and also to a program to identify efficiency measures in public facilities, saving energy and money.

We look forward to continuing to partner with PSE and the UTC to accelerate the transition to clean energy sources, while ensuring the equitable distribution of clean energy benefits to all King County residents, including clean air, savings, and comfort from efficient homes and buildings, and family-wage jobs.

Thank you for the opportunity to comment.

Sincerely,



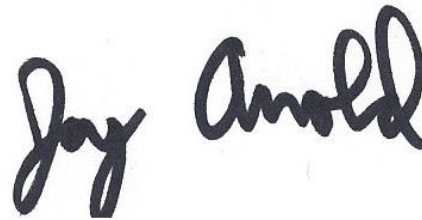
Dow Constantine  
King County Executive



Nancy Tosta  
Burien City Council



Nigel Herbig  
Deputy Mayor, City of Kenmore



Jay Arnold  
Deputy Mayor, City of Kirkland



Bruce Bassett  
Mercer Island City Council



Benson Wong  
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Will Hall  
Mayor, City of Shoreline



Matt Larson  
Mayor, City of Snoqualmie