



NW Energy Coalition

UE-190905

UE-190908

UE-190912

July 1, 2022

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
Lacey, WA 98503

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*Re: Docket Nos. UE-190912 (Avista Biennial Conservation Plan), UE-190908 (PacifiCorp Biennial Conservation Plan), and UE-190905 (Puget Sound Energy Biennial Conservation Plan) 2020-2021 Biennial Conservation Reports, EIA Achievements*

Dear Ms. Maxwell:

Thank you for the opportunity to comment in these dockets on the conservation achievement of the three electric investor-owned utilities, as required by the Energy Independence Act (EIA). The NW Energy Coalition is a public interest nonprofit working toward a clean, affordable, and reliable future for customers in the Pacific Northwest. Energy efficiency is a key tenet for how we collectively will meet these goals and achieve a decarbonized energy system, and thus we are very supportive of utility energy efficiency programs that can help meet resource and peak needs, as well as help relieve energy burden and provide other non-energy benefits to customers.

It is without question that the COVID-19 pandemic had significant effects in 2020, with government-mandated shutdowns of much inside work. In 2021, impacts continued with supply-chain shortages and labor shortages. While we are disappointed that all three electric utilities fell short of their EIA targets, we understand the extraordinary circumstances that led to this outcome.

However, it is also without question that energy efficiency and conservation continue to be incredibly important for meeting our state's decarbonization targets and reducing energy burden for all customers. The current economic situation and the rising cost of energy underlines the importance of energy efficiency for customers.

In our comments in May 2020 in these same dockets, we said, "Going forward, in the midst of and coming out of this crisis, we urge the companies to be as nimble as possible and to adapt programming aggressively, and in coordination with local and state partners." This continues to hold true. We are on the conservation advisory groups for each of these utilities, and have appreciated the frequent updates on how the Companies sought to adaptively manage programs and make space for innovation and creativity over the last biennium, and we look forward to this continued effort in the current biennium to ensure that the 2022-2023 targets are handily met. There are new opportunities with federal funding that is flowing through the

state and Climate Commitment Act investments that should be proactively leveraged to enhance the utilities' efforts, and we look forward the advisory groups discussing these opportunities to best serve customers.

Thank you for the opportunity to comment.

Best,

Amy Wheelless  
Senior Policy Associate