

November 12, 2020

Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

Re: Docket UE-190698 and Docket UE-191023

Dear Commissioners,

I want to thank you and the UTC staff for all of your important work on the Clean Energy Transformation Act (CETA).

After reading over CETA again I realized I missed something in my previous comment that looks very important and am hoping you take it into consideration. I added the words *perennial herbaceous and woody* to the list of Biomass to clarify dedicated crops so the Biomass Energy section should be:

*"Biomass energy" includes: Organic by-products of pulping and the wood manufacturing process; animal manure; solid organic fuels from wood; forest or field residues; untreated wooden demolition or construction debris; food waste and food processing residuals; liquors derived from algae; dedicated **perennial herbaceous and woody** energy crops ; and yard waste.*

I think that is most likely what everyone has in mind. If it is not written down to give good direction some well meaning person may start to grow annual crops like Corn or Soybeans which will negate the carbon sequestration benefits, disturb and kill soil microbes, pesticides and synthetic fertilizers would most likely be used and soil would erode. Please see attached appendix with the Dedicated Energy Crops section from the Department of Energy website for more information.

Further Recommendations:

- I agree with the UTC staff's view of the following sentence and would support keeping it in rather than striking it: "utilities must ensure that all planning and investment activities are consistent with the clean energy transformation act."
- Please add "GHG Neutral" to the list of definitions at the beginning.

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- If there are three climate weather scenarios in sensitivities, I think all three or at least two (so there is a comparison) reflect the reality of future climate impacts rather than just one.
- Looking at pages 9,10,12,15, and 16 I see that public participation for IRP's has been changed. I am curious to know why the change has been made and what the Advisory Group would look like and how would it be formed. Please define Advisory Group. Is it possible that years of different views on the importance of acting to reduce GHG's has created a divide between some electric utility's and customers? If so, is it possible to mend the divide? Public involvement is very important! I like the new focus on working to involve the more vulnerable. Looking forward to being involved in future IRP's and continuing to increase my knowledge.
- Some data disclosure sections require that data be disclosed in "native format" which can be hard to understand, while other sections require "native format" and data "in an easily accessible format." I recommend that all sections on data disclosure require the data to be provided "in an easily accessible format. "Further, full data disclosure should be the goal, including but not limited to Aurora, Plexos, demand forecast and others. If utilities have concerns about confidentiality, then non-disclosure agreements can be required as is now happening in other states. This is key to transparency.
- Please consider requiring variable cost modeling in all calculations and modeling that relate to the social cost of greenhouse gases.

Once again we can all be proud to be Washingtonians!! Thank YOU for listening to all of us and for your time and dedication in moving us to a clean energy future!!! I look forward to reading your responses!

Stay well and safe,



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Appendix - Dedicated Energy Crops section from DOE website

The following can be found at

<https://www.energy.gov/eere/bioenergy/biomass-resources>

DEDICATED ENERGY CROPS

Dedicated energy crops are non-food crops that can be grown on marginal land (land not suitable for traditional crops like corn and soybeans) specifically to provide biomass. These break down into two general categories: herbaceous and woody. Herbaceous energy crops are perennial (plants that live for more than 2 years) grasses that are harvested annually after taking 2 to 3 years to reach full productivity. These include switchgrass, miscanthus, bamboo, sweet sorghum, tall fescue, kochia, wheatgrass, and others. Short-rotation woody crops are fast-growing hardwood trees that are harvested within 5 to 8 years of planting. These include hybrid poplar, hybrid willow, silver maple, eastern cottonwood, green ash, black walnut, sweetgum, and sycamore. Many of these species can help improve water and soil quality, improve wildlife habitat relative to annual crops, diversify sources of income, and improve overall farm productivity.