

**Docket Nos. UE-191023 and UE-190698 - Vol. I**

**In re the Clean Energy Implementation  
Plans/Compliance with the Clean Energy**

**December 9, 2020**



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BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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Docket Nos. UE-191023 and UE-190698  
VIRTUAL ADOPTION HEARING  
In re the Clean Energy Implementation Plans/Compliance  
with the Clean Energy  
VOLUME I  
Pages 1-74

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December 9, 2020  
9:30 a.m.

Washington Utilities and Transportation Commission  
621 Woodland Square Loop Southeast  
Lacey, Washington 98503

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1                   A P P E A R A N C E S  
2   DAVE DANNER, Chair  
3   ANN E. RENDAHL, Commissioner  
4   JAY BALASBAS, Commissioner  
5  
6   COMMENTS OFFERED BY:  
7   BRAD CEBULKO  
8   SHAWN BONFIELD  
9   JON PILIARIS  
10   ETTA LOCKEY  
11   NINA SUETAKE  
12   KATIE WARE  
13   DOUG HOWELL  
14   KELLY HALL  
15   TYLER PEPPE  
16   COURT OLSON  
17   KEVIN JONES  
18   JANE LINLEY  
19   ELEANOR BASTIAN  
20   JONI BOSH  
21   SIMON FFITCH  
22   ELLIOT WEINSTEIN  
23  
24  
25                   \* \* \* \* \*

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1                   LACEY, WASHINGTON; DECEMBER 9, 2020  
2                   9:30 A.M.  
3                   --o0o--  
4                   P R O C E E D I N G S  
5  
6                   CHAIR DANNER: Good morning, everyone. My  
7                   name is Dave Danner, and I'm Chair of the Utilities and  
8                   Transportation Commission, and today is  
9                   December 9th, 2020, and we are convened to consider the  
10                  adoption of rules that would implement the Clean Energy  
11                  Transformation Act, and this is Docket UE-191023 and  
12                  Docket 190698.  
13                  I am joined this morning by my colleagues,  
14                  Commissioner Ann Rendahl and Commissioner Jay Balasbas.  
15                  Before we get started, I'd just like to  
16                  thank everyone for participating, not just today, but  
17                  for those who have been participating throughout the  
18                  process of adopting those rules we're considering today.  
19                  Just speaking for myself, as we've gone  
20                  through this process, I have been looking first and  
21                  foremost to make sure that we're achieving the goals of  
22                  Clean Energy Transformation Act and that goal is to  
23                  reduce carbon emissions in the energy sector. It's a  
24                  very important piece of legislation that's also a very  
25                  complex piece of legislation, and I think that has

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1                   become clear as we've worked through this process.  
2                   Our other goals besides achieving the -- the  
3                   goals of the legislature is to ensure that we're doing  
4                   so at the lowest reasonable cost that we can and that  
5                   we're providing clarity not only to the utilities and  
6                   stakeholders, but to the public as we move through this  
7                   and that we are including traditionally underrepresented  
8                   voices in the processes as we move to a low carbon  
9                   future.  
10                  So I want to thank you very much. Let me  
11                  turn it over to my colleagues if they have anything they  
12                  would like to say before I ask Brad Cebulko of the  
13                  Commission Staff to give us some of the logistics for  
14                  this morning.  
15                  Commissioner Rendahl, are you there?  
16                  COMMISSIONER RENDAHL: I am, thank you. And  
17                  I too appreciate the extensive comments we've received,  
18                  the engagement from all different stakeholders in this  
19                  very important work that we're doing today. And so I  
20                  appreciate all of the engagement. It's been a very long  
21                  process, and we're here today to hear additional  
22                  comments and consider adoption of these rules and so  
23                  thank everyone for their involvement.  
24                  CHAIR DANNER: Thank you.  
25                  Commissioner Balasbas, anything you'd like

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1 to say before we start?  
 2 COMMISSIONER BALASBAS: Yes, thank you,  
 3 Chair Danner. Good morning to you and Commissioner  
 4 Rendahl and everyone. I just want to also thank  
 5 everybody for their comments and engagement throughout  
 6 this process and very [phone interference.]  
 7 CHAIR DANNER: All right. Thank you.  
 8 So I'd ask everyone, please, if you can,  
 9 please mute your phones. I've been hearing some  
 10 background noises of course when you're not on mute  
 11 [phone interference] such as right now. All right.  
 12 Thank you.  
 13 So I'm now going to turn it over to Brad  
 14 Cebulko of the Commission policy staff, who will get us  
 15 started this morning. Brad Cebulko, are you there?  
 16 MR. CEBULKO: Yes, I am. Can you hear me,  
 17 Chair?  
 18 CHAIR DANNER: I sure can. Thank you.  
 19 MR. CEBULKO: Great. Good morning, Chair  
 20 Danner, Commissioners Rendahl and Balasbas. My name is  
 21 Brad Cebulko, and I'm Senior Policy Advisor for energy  
 22 strategy at the Commission. Since 2019, I have been  
 23 leading the integrated resource planning and Clean  
 24 Energy implementation plan rulemaking.  
 25 To start with a little housekeeping for all

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1 the attendees before we continue, please make sure you  
 2 mute yourself if you're not talking. In doing so, you  
 3 can hit the mute button. If you're calling in from your  
 4 phone, please use the star 6 -- star 6 function on your  
 5 phones to mute and unmute yourself. If someone's phone  
 6 is not on mute and there's noise coming through the  
 7 line, we will put you on mute and you won't be able to  
 8 speak unless you call back in.  
 9 Back to the rulemakings. These rulemakings  
 10 have been a long and challenging process, both because  
 11 of the complexity of the material and the unusual times  
 12 that surround us. It couldn't have been successful  
 13 without a large team here at the agency and the valuable  
 14 contributions of the stakeholders.  
 15 I want to take this moment and sincerely  
 16 thank both the team for their incredible work and the  
 17 stakeholders for their questions, suggestions, and  
 18 conversations. As you can see through the iterations of  
 19 the draft, those suggestions have greatly influenced the  
 20 Commission's work.  
 21 To review, the Commission initiated both of  
 22 these rulemakings in response to the passage of the  
 23 Clean Energy Transformation Act, called CETA, in the  
 24 2019 legislative session. However, the two rulemakings  
 25 were initially on separate tracks. CETA included

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1 several changes to RCW 19.280, which guides the  
 2 development of electric resource planning. The  
 3 Commission had existing rules for IRPs. CETA also  
 4 promulgated a new statute, RCW 19.405, which governs  
 5 clean energy implementation plans. The Commission had  
 6 to build those rules from scratch.  
 7 We kicked off the IRP rulemaking with a  
 8 CR-101, draft rules, and questions or comments in  
 9 November 2019. Staff then held workshops on January  
 10 16th on greenhouse gas accounting and resource planning;  
 11 January 28th on low income and energy assistance;  
 12 February 5th on equity and utility planning; May 5th on  
 13 public engagement and utility planning; May 22nd on  
 14 equity provisions; and June 8th on demand response  
 15 potential. The Commission issued two sets of draft  
 16 rules; first in November 2019 and then a second draft  
 17 combined with the CEIP rules in August 2020.  
 18 The Commission initiated the CEIP rulemaking  
 19 in January 2020 by filing a CR-101 and asking questions  
 20 of stakeholders. In addition to the previously  
 21 mentioned workshops, the Commission held workshops to  
 22 discuss the incremental cost of compliance on March 17th  
 23 and June 16th. Commission also held a workshop on the  
 24 interpretation of RCW 19.405.040 on July 27th. The  
 25 Commission issued two sets of draft rules prior to the

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1 CR-102. The Commission also sought comments on the  
 2 appropriate interpretation of RCW 19.405.040 in June and  
 3 November of 2020.  
 4 The Commission issued a revised CR-101  
 5 consolidating the two dockets on August 18th, 2020. The  
 6 Commission issued the CR-102 for the consolidated  
 7 dockets on October 14th.  
 8 We received comments from more than 24  
 9 parties and persons on the -- on the CR-102. Based on  
 10 those comments, Staff proposes the Commission adopt a  
 11 recommended non-substantive changes to WAC 480-100-600  
 12 series, which you may see in the documents that were  
 13 filed on December 4th.  
 14 That ends my comments. The members of the  
 15 rulemaking team are available for questions now and  
 16 throughout the hearing. Thank you.  
 17 CHAIR DANNER: Thank you. And let me ask my  
 18 colleagues if they have any questions for -- for Brad  
 19 before we begin.  
 20 COMMISSIONER RENDAHL: This is Commissioner  
 21 Rendahl, and I do not have any questions for Brad at  
 22 this point.  
 23 CHAIR DANNER: All right. Thank you.  
 24 COMMISSIONER BALASBAS: And this is  
 25 Commissioner Balasbas. I also do not have any questions

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1 at this point.  
 2 CHAIR DANNER: Okay. Very good. Let's go  
 3 into comments now. We have a sign-in sheet. We've  
 4 asked folks to sign in. I understand there may be other  
 5 people on the line who have not signed in. When I get  
 6 through those who have signed in, I will just be going  
 7 through the alphabet to make sure that those who wish to  
 8 speak this morning have an opportunity to do so.  
 9 So at this point, let me ask, I understand,  
 10 Christine Grant, that you need to -- you're not  
 11 available for very long, so if you'd like to go first if  
 12 you're on the line.  
 13 MS. BASTIAN: Good morning. This is Eleanor  
 14 Bastian. I was just in touch with Christine Grant, and  
 15 she's going to have to submit a written comment this  
 16 morning. She's no longer available to speak.  
 17 CHAIR DANNER: Okay. I'm sorry that  
 18 she's -- she was unavailable, but we will certainly  
 19 accept her written comment.  
 20 In fact, that would be a question I should  
 21 pose to Brad. This is a rulemaking adoption hearing,  
 22 how long are we taking the written comments for?  
 23 MR. CEBULKO: Thank you, Chair Danner. I'm  
 24 hoping my attorney, Nash Callaghan, or one of the judges  
 25 assigned to the case can help me with that. I'm not

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1 certain.  
 2 MR. CALLAGHAN: This is Nash Callaghan. I  
 3 think because she's unavailable, we can accept her  
 4 written comment today.  
 5 CHAIR DANNER: Okay. Are we accepting other  
 6 written comments, Mr. Callaghan?  
 7 MR. CALLAGHAN: If folks are unavailable,  
 8 then we can certainly decide to accept written comments.  
 9 If the Commission would like, we can certainly accept  
 10 other written comments, but given that there's an  
 11 opportunity to speak today, I think that we should only  
 12 accept written comments for those who are -- were  
 13 unavailable.  
 14 CHAIR DANNER: All right. Commissioner  
 15 Balasbas, Commissioner Rendahl, do you have thoughts on  
 16 this? Should we just make it available for Ms. Grant or  
 17 should we accept comments through the end of the day  
 18 today?  
 19 COMMISSIONER RENDAHL: So this is  
 20 Commissioner Rendahl, and I think we should make  
 21 comment -- the availability for written comments to  
 22 those who cannot speak today, those who basically let us  
 23 know that they cannot speak today. But we have already  
 24 received extensive comments in this docket, and so I'm  
 25 willing to accept them for Ms. Grant, but I'm not sure

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1 we should open it up widely to the general public, as we  
 2 have already received extensive comments.  
 3 COMMISSIONER BALASBAS: And this is  
 4 Commissioner Balasbas, and I would agree with  
 5 Commissioner Rendahl on that. I -- we -- we have  
 6 received numerous and extensive comments, and I think  
 7 that -- I think accepting them from Ms. Grant, because  
 8 of her unavailability today, makes sense, but I think I  
 9 would not open it up any further.  
 10 CHAIR DANNER: Okay. And I agree with my  
 11 colleagues, so I think we have made a decision. So we  
 12 will accept Ms. Grant's comments today, but otherwise we  
 13 will take this under advisement at the end of the day  
 14 and we will not be receiving more comments. We have  
 15 already received many.  
 16 So with that, let me turn to the sign-in  
 17 sheet and let me call on Shawn Bonfield from Avista  
 18 Utilities, are you there?  
 19 MR. BONFIELD: I am. Can you hear me okay?  
 20 CHAIR DANNER: Yes, I can. Thank you.  
 21 MR. BONFIELD: Great. Thank you. Good  
 22 morning, Chair Danner, Commissioners Rendahl and  
 23 Balasbas. Shawn Bonfield, Senior Manager of Regulatory  
 24 Policy and Strategy representing Avista. With me today  
 25 are a number of colleagues who have been involved in the

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1 CETA rulemaking process. Avista appreciates the  
 2 opportunity to provide comments today.  
 3 The Clean Energy Transformation Act is a  
 4 complex set of legislation that will lead to drastic  
 5 changes of the energy and delivery system in the state  
 6 of Washington. Avista's fully supportive of the  
 7 transition to clean energy, especially given our legacy  
 8 of clean hydroelectric generation as well as investments  
 9 in other clean energy resources long before the Energy  
 10 Independence Act announced CETA.  
 11 We recognize the rulemaking process to  
 12 implement such an important piece of legislation  
 13 required a heavy lift from Commission Staff and all the  
 14 parties involved. Commission Staff deserves recognition  
 15 for their efforts to develop a first set of rules  
 16 implementing CETA, given a wide variety of views and  
 17 interpretations.  
 18 The final proposed rules we are here to  
 19 discuss today are not perfect and no doubt will need  
 20 refinement in the future after we file our first energy  
 21 action plan, Clean Energy Implementation Plan, and clean  
 22 energy compliance report. Not only will our IRP process  
 23 change and then we will have significant inner reporting  
 24 requirements, but the introduction of equity  
 25 considerations as a result of CETA will be a learning

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1 process that we all -- we will all be -- better  
 2 understand with time and experience.  
 3 Avista does remain concerned with several  
 4 areas of the rules, which we have stated in our prior  
 5 written comments. We will not rehash those comments  
 6 today, but rather we'll focus on a limited number of  
 7 issues we believe need further review.  
 8 First, I would like to address proposed WAC  
 9 480-100-620 Section 10(c), which adds new requirements  
 10 to the IRP calling for a sensitivity that is a maximum  
 11 customer benefit scenario. It is unclear what this  
 12 scenario entails, and Staff did not provide further  
 13 explanation as to what it may mean in their response in  
 14 the comment matrix. As such, we are puzzled about what  
 15 we must model. The rules should be clear regarding what  
 16 is required in the IRP, and this provision fails on that  
 17 front. Further, this sensitivity is not required by  
 18 statute.  
 19 It's Staff's response to Avista's request to  
 20 remove this new requirement. They state the sensitivity  
 21 will promote creative thinking and ensure broad  
 22 consideration of customer benefit opportunities. Again,  
 23 this is a vague response to what this new sensitivity  
 24 entails and should be removed from the rules.  
 25 Staff and other stakeholders always have the

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1 opportunity to request sensitivities and scenarios  
 2 during the development of an IPR. That is the venue  
 3 where scenarios should be proposed, discussed, and  
 4 vetted so the entire tack can help define the best  
 5 possible scenario rather than include an undefined  
 6 ambiguous requirement rule.  
 7 Moving on, the primary issue of concern that  
 8 we would like to elaborate on in greater detail is the  
 9 incremental cost of compliance discussed in proposed WAC  
 10 480-100-660. Our concerns regarding the proposed draft  
 11 rules fall into four categories.  
 12 First, the social cost of greenhouse gas  
 13 being including in the baseline for calculating the  
 14 incremental cost of compliance. CETA expressly states  
 15 that all costs used to determine the cost of compliance  
 16 must be directly attributed to actionable or actions  
 17 necessary to comply with the requirements of RCW  
 18 19.405.040 and 050. Respectfully, these costs do not  
 19 include the social cost of greenhouse gas. Such a cost  
 20 is not a law and therefore should not be in the rule.  
 21 Second, utilizing the formula included in  
 22 the draft rule would lead to a utility spending roughly  
 23 5 percent annually over a four-year period, well over  
 24 the 2 percent rate in the law. The formula is based on  
 25 compounding year-over-year increases with a focus on

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1 total cost spent over a peak period rather than an  
 2 annual rate impact over the four-year period.  
 3 Three, the proposed calculation relies on  
 4 projections and backward-looking views of actual revenue  
 5 requirements. It also relies on hindsight-informed  
 6 views of revenue requirements and estimated incremental  
 7 costs. This view fails to give utilities certainty when  
 8 planning to meet customer lows in a lowest reasonable  
 9 cost manner. This can be easily resolved by  
 10 interpreting the previous year to make the adjusted  
 11 revenue requirement of the year prior to the compliance  
 12 period.  
 13 And lastly, under the proposed methodology,  
 14 the baseline is reset every four years resulting in the  
 15 utility not being able to indicate what it would have  
 16 done absent CETA prior to the four-year period. While  
 17 this issue could be difficult to correct, it compounds  
 18 cost increases as compared to alternative resource  
 19 selection absent CETA.  
 20 In our written comments, we noted that  
 21 incremental -- the incremental cost calculation for  
 22 compliance should be based on the average rate increase  
 23 per year rather than on the total dollar spent over a  
 24 CEIP period. Commission Staff stated they agreed with  
 25 this assessment and the response in the comment matrix,

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1 yet the rules state otherwise. Specifically Section 2  
 2 states the utility must calculate the average annual  
 3 threshold amount for determining compliance. Clearly,  
 4 this language focuses on the dollar amount rather than  
 5 the average annual rate increase.  
 6 The formula assumes that an actual 2 percent  
 7 in directly attributable costs will be spent each year  
 8 over a CEIP period. That is unlikely to ever happen due  
 9 to the nature of utility investments.  
 10 This fundamental difference of  
 11 interpretation leads to drastically different results.  
 12 Alternative calculations show that a utility can spend  
 13 much less than the proposed formula indicates, up to 250  
 14 percent less, yet still average the 2 percent per year  
 15 as proposed in the law. We and other utilities have  
 16 included examples in our prior comments and AWEC  
 17 provides well-written examples in their comments filed  
 18 on November 12th as well.  
 19 Because of this disagreement on the  
 20 important issue, we propose Section 650 not be finalized  
 21 today and instead be delayed for further workshops and  
 22 discussions. The draft of the proposed compliance  
 23 mechanism is backward-looking so would not really come  
 24 up for consideration until a utility files their clean  
 25 energy compliance report in 2026. As such, there is no

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1 need for this issue to be decided now. The final  
2 determination could be delayed by three to six months  
3 and have no impact, at least for Avista.  
4 Thank you again for the opportunity to  
5 comment today. We stand ready if you have any follow-up  
6 questions regarding our written comments or comments I  
7 made today. Thank you.  
8 CHAIR DANNER: Thank you very much,  
9 Mr. Bonfield.  
10 Commissioners, do you have any questions for  
11 Avista?  
12 COMMISSIONER RENDAHL: I do not. Thank you.  
13 CHAIR DANNER: All right. Hearing none,  
14 thank you very much, Mr. Bonfield --  
15 COMMISSIONER RENDAHL: Dave, I believe  
16 you're muted.  
17 CHAIR DANNER: You are correct.  
18 Jon Piliaris from Puget Sound Energy, are  
19 you there?  
20 MR. CEBULKO: Jon, this is Brad Cebulko,  
21 you're quite faint.  
22 MR. PILIARIS: Let me -- let me try and call  
23 in with my phone. I continue to have problems with the  
24 audio on my computer.  
25 MR. CEBULKO: We can hear you now.

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1 MR. PILIARIS: Oh, you can?  
2 CHAIR DANNER: Yes.  
3 MR. PILIARIS: Well, thank you. I'll just  
4 speak up. All right. Well, so good morning, Chair  
5 Danner and Commissioners Balasbas and Rendahl. For the  
6 record, my name is Jon Piliaris. I am the director of  
7 regulatory affairs for Puget Sound Energy.  
8 We appreciate the significant time and  
9 effort the Commission has put into this rulemaking over  
10 the last year and a half. The breadth as well as the  
11 complexity of the issues at hand in this rulemaking  
12 have been substantial. And we appreciate how hard you  
13 and your staff have worked to move many important  
14 rulemakings forward during what has been clearly a  
15 challenging year.  
16 PSE also appreciates and agrees with the  
17 Commission's perspective that the perfection of the CEIP  
18 process and the rules more generally will be iterative.  
19 As was the case with I-937, it will take some time and  
20 real experience to get this set of rules right.  
21 Many of the details that are not squarely  
22 addressed in this initial set of rules will need to be  
23 worked out over time as all the parties learn how best  
24 to implement CETA as we progress towards meeting the  
25 2030 greenhouse gas neutral standard, a standard that

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1 PSE is strongly committed to achieving in a manner that  
2 is equitable and affordable and does not jeopardize  
3 service reliability.  
4 In particular, PSE supports the strong focus  
5 on equity throughout this rulemaking. We look forward  
6 to continuing those discussions next year with the  
7 Commission and stakeholders as we participate in more  
8 workshop discussions and begin to stand up our own  
9 equity advisory groups to further develop this important  
10 work. We also appreciate adjustments that were made in  
11 the CR-102 draft that lessened some of the  
12 administrative burden inherent and earlier drafts of  
13 these rules. It's a good start.  
14 To the extent that the Commission has  
15 signalled an interest in significantly streamlining  
16 reporting requirements, we also welcome those efforts.  
17 While we believe transparency through reporting is  
18 important, PSE strongly supports any streamlining of  
19 reporting requirement that enable us to dedicate more of  
20 our resources towards actually achieving the goals of  
21 CETA.  
22 With that backdrop, there are just a few  
23 issues I'd like to touch on this morning.  
24 First, it is important to recognize the  
25 increased focus on customer benefits and robust public

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1 participation processes in these rules. Rather than  
2 simply focusing on lowest reasonable cost, this will  
3 require utilities to incorporate more diverse rules, our  
4 views, and considerations than ever before. This will  
5 be an area of particular focus and discussion during the  
6 CEIP review period in the fall of 2021.  
7 Second, the clean energy implementation  
8 plans are intended to be forward-looking plans. As you  
9 heard with Avista, unfortunately the handling of this 2  
10 percent cost cap and rules is not. As a result, the  
11 backward-looking accounting proposed in the rules to  
12 implement the 2 percent cost cap makes this alternative  
13 compliance path simply unworkable for PSE.  
14 That being said, while PSE questions the  
15 viability of the incremental cost provision as a  
16 compliance rule, we believe the compounding assumptions  
17 in the incremental cost calculation rule language is  
18 consistent with the legislative intent.  
19 At the very least, it is consistent with  
20 PSE's recollection of the discussions that occurred  
21 during the development of CETA regarding how this 2  
22 percent cost cap would work. This was envisioned to be  
23 an annual average rate increase compounded over the  
24 four-year implementation period. Moreover, PSE believes  
25 this level of rate increase will be necessary for it to

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1 fund the investments required to achieve the CETA goals.  
2 Anything less could put the achievement of these goals  
3 out of reach.  
4 As it relates to the baseline against which  
5 to measure the incremental cost of compliance, PSE also  
6 appreciates the flexibility written into rules. If PSE  
7 opts to use the incremental cost of alternative  
8 compliance pathway, PSE prefers to use a methodology  
9 that establishes a baseline for the alternative lowest  
10 reasonable cost that is modeled after its existing  
11 energy efficiency cost-effectiveness test.  
12 That being said, as we noted in our earlier  
13 comments, at this time, PSE believes that it is very  
14 unlikely that it will rely on the incremental cost  
15 provisions as the means of demonstrating alternative  
16 compliance due to the administrative complexity. More  
17 likely, PSE intends to use the 2 percent cost  
18 calculation as a general guide when compiling its draft  
19 CEIP, particularly as it relates to the proposed target  
20 and the associated budget.  
21 With respect to the IRP rules, we again  
22 acknowledge and appreciate the focus on the importance  
23 of public engagement. To that end, even after our draft  
24 IRP is filed in January, PSE will continue with its  
25 public input process and stakeholders will have an

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1 opportunity to provide feedback on analysis that is  
2 completed after the draft IRP is filed.  
3 That being said, while PSE fully intends to  
4 incorporate stakeholder feedback on the draft IRP  
5 received during the comment period that will begin in  
6 January, this will be increasingly difficult to  
7 accomplish in a meaningful way as time passes. By the  
8 time the public meeting on the draft IRP is held in late  
9 February, there will only be a little over a month to  
10 incorporate any additional feedback prior to completing  
11 the final IRP on April 1. Practically speaking, there  
12 simply won't be enough time to make anything more than  
13 minor adjustments to the draft. To be clear, PSE will  
14 do what it can with the time that it has, but we also  
15 want to be up front in this regard.  
16 Finally, we look forward to further  
17 discussions next year about how to effectively  
18 demonstrate compliance with the CETA requirement to  
19 remove coal-fired resources for the utility's allocation  
20 of electricity. While PSE remains committed to moving  
21 off of coal by 2025, we acknowledge that more  
22 conversation needs to take place to determine how  
23 compliance through attestation will be accomplished,  
24 particularly for market purposes.  
25 PSE also agrees that this rulemaking next

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1 year should address the interpretation of a utility's  
2 use of electricity to serve customers under CETA. These  
3 are both important issues that should be addressed more  
4 fully next year, and PSE looks forward to continuing  
5 these conversations with the Commission and  
6 stakeholders.  
7 With that, I want to thank you again for the  
8 opportunity to comment this morning.  
9 CHAIR DANNER: All right. Thank you,  
10 Mr. Piliaris.  
11 Commissioners, are there any questions for  
12 Puget Sound Energy?  
13 COMMISSIONER BALASBAS: This is Commissioner  
14 Balasbas. I do have one question, Chair Danner.  
15 CHAIR DANNER: Please go ahead.  
16 COMMISSIONER BALASBAS: Thank you.  
17 Good morning, Mr. Piliaris. I just wanted  
18 to ask just one question following up a comment you made  
19 a minute ago about the incremental cost provision and  
20 the compounding effect. I just wanted to understand if  
21 you -- in looking at what is in proposed WAC 480-100-660  
22 that the formula would -- would effectively turn the 2  
23 percent into a 5 percent threshold, I believe as  
24 Mr. Bonfield from Avista commented a few minutes ago.  
25 MR. PILIARIS: You know, I -- I think that

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1 this issue is a matter of perspective. We can either  
2 look at this as a 2 percent compounded annual rate  
3 increase or you could take it as a one-time 5 percent  
4 increase in the first year of the four-year period that  
5 remains flat over that period. I think mathematically  
6 they're generally equivalent.  
7 So I think we're both right. I think it's  
8 just a matter of perspective as to how -- how you want  
9 to frame the amount of increases inherent in those  
10 calculations.  
11 COMMISSIONER BALASBAS: Okay. And but --  
12 but you would agree, though, that the -- that it was  
13 PSE's recollection in the development of this provision  
14 of the law that it was more, I believe, the former of  
15 what you were talking about, which is framed more than  
16 as a 2 percent compounded rate increase over a four-year  
17 period.  
18 MR. PILIARIS: That's certainly what PSE had  
19 envisioned. PSE had envisioned that there would be  
20 steady rate increases of 2 percent that could occur each  
21 year that would smooth out the rate impacts to customers  
22 over time and give some degree of predictability over  
23 the -- over the compliance period. We did not envision  
24 a one-time 5 percent increase that would only occur  
25 every four years.

1 COMMISSIONER BALASBAS: Okay. All right.  
2 Thank you very much.

3 CHAIR DANNER: So, Mr. Piliaris, following  
4 up on that, it's your understanding that the cost cap is  
5 a ceiling and not a floor; is that correct?

6 MR. PILIARIS: We see the 2 percent cost cap  
7 as a compliance tool. We don't see it as necessarily a  
8 ceiling. I think that the -- the legislation allows for  
9 a utility to in fact propose greater than 2 percent.

10 And if the Commission agrees that it was in the public  
11 interest to approve such a plan that required greater  
12 than 2 percent, I don't think that there's anything in  
13 the statute that would prohibit that. I think, however,  
14 if a -- if a utility did not wish to -- to increase its  
15 customer's rates by greater than 2 percent, that that  
16 would provide the out for the utility to not go beyond  
17 that level.

18 CHAIR DANNER: And but even -- even with the  
19 cost cap being compounded, I mean, we still -- the  
20 Commission still has to review expenditures, make  
21 prudence decisions and -- and the utility has to be  
22 ensuring that it's achieving the goals of CETA at the  
23 lowest reasonable cost, correct?

24 MR. PILIARIS: That is correct.

25 CHAIR DANNER: All right. Thank you very

1 implemented that amalgamate multiple components into a  
2 single hole. I refer to these programs as platypuses,  
3 and like the actual platypus did to naturalists and  
4 scientists, I suspect that CETA will frustrate, confuse,  
5 and confound many of us for years and possibly decades  
6 to come. I hope, however, that CETA will also prove to  
7 be exciting, exhilarating, and transformative similar to  
8 the recent discovery that platypuses have bioluminescent  
9 fur.

10 Recognizing the implementation challenges  
11 faced by the Commission Staff and stakeholders and the  
12 significant work over a compressed period of time,  
13 PacifiCorp appreciates the robust stakeholder process  
14 that led to the draft rules that are before you for your  
15 consideration today.

16 Despite this appreciation and as noted in  
17 several rounds of comments, PacifiCorp does not support  
18 adoption of rules as currently drafted and recommends  
19 modification and clarification of several key  
20 components. Our November 12th comments detailed these  
21 recommendations in depth, and I will not repeat them in  
22 their entirety here but will instead focus on four  
23 critical areas.

24 First, PacifiCorp recommend that the  
25 Commission modify the incremental cost calculation

1 much.

2 Any other questions for Mr. Piliaris?

3 All right. Thank you, sir. Appreciate you  
4 being here this morning.

5 MR. PILIARIS: Thank you.

6 CHAIR DANNER: All right. Etta Lockey from  
7 PacifiCorp, are you there?

8 MS. LOCKEY: I am. Good morning. Good  
9 morning, Chair Danner, Commissioner Rendahl, and  
10 Commissioner Balasbas. For the record, my name is Etta  
11 Lockey, and I am the Vice President of Regulation at  
12 PacifiCorp. Thank you for the opportunity to be here  
13 today and to make these brief comments.

14 As others have done at the outset, I would  
15 like to acknowledge the breadth and scope of the task  
16 before the Commission today. CETA is a complex piece of  
17 legislation. It is not a traditional cap and trade  
18 emissions reduction program, although it will likely  
19 have the effect of reducing emissions. It's not exactly  
20 a renewable procurement program, although it relies on  
21 REC-based compliance. It is not an equity program,  
22 although it takes bold steps towards integrating equity  
23 into the regulatory environment in new ways.

24 In this -- in myriad other ways, CETA is  
25 like other pieces of legislation I have worked on and

1 contained in proposed WAC 480-100-660 and we support  
2 Avista's recommendation today that the Commission not  
3 adopt the section of the rules at this time. As  
4 detailed in our comments and in the comments of several  
5 other stakeholders, the incremental cost calculation  
6 contained in the draft rules is inconsistent with the  
7 statute, does not meaningfully cap compliance cost, and  
8 does not guide utility decision-making with regard to  
9 acquisition and compliance decisions.

10 PacifiCorp proposes the Commission adopt a  
11 straightforward approach that multiplies the actual  
12 Commission basis report revenues immediately proceeding  
13 the CEIP filing by 2 percent over four years to allow an  
14 8 percent total increase over the four-year compliance  
15 period.

16 Like PSE, PacifiCorp appreciates that the  
17 draft rules contemplate utilities proposing their own  
18 methodology for calculating incremental costs as part of  
19 their CEIP, and PacifiCorp is likely to take this  
20 approach assuming that the rules are not modified.  
21 PacifiCorp cannot support an incremental cost  
22 calculation that would allow large rate increases over a  
23 single four-year compliance period that would have  
24 devastating effects for our customers.

25 Second, PacifiCorp recommends the Commission

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1 delete reference to the social cost of greenhouse gasses  
 2 in the definition of the lowest reasonable cost  
 3 alternative portfolio. While PacifiCorp accepts the use  
 4 of the social cost of greenhouse gas as a planning tool,  
 5 including the social cost of greenhouse gases in the  
 6 lowest reasonable cost alternative portfolio assumes  
 7 that there is an actual cost to utility customers  
 8 associated with greenhouse gas emissions.  
 9 At this time, there is no such cost and  
 10 inclusion of the social cost of greenhouse gas in the  
 11 lowest reasonable cost alternative portfolio  
 12 inappropriately and asymmetrically inflates the cost of  
 13 the alternative portfolio while simultaneously making it  
 14 even more difficult to ascertain the actual cost impact  
 15 of CETA compliance to customers.  
 16 Third, PacifiCorp strongly encourages the  
 17 Commission to delete the requirement in WAC 480-100-650,  
 18 Subsection 3(a) requiring the utility to provide an  
 19 attestation that the utility did not use any coal-fired  
 20 resources to serve Washington load.  
 21 In the alternative, PacifiCorp recommends  
 22 the Commission modify the rule language to reflect the  
 23 statutory requirement to remove coal-fired resources  
 24 from the utility's allocation of electricity. CETA  
 25 requires utilities to remove coal-fired generation from

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1 their allocation of electricity by 2025. As evidenced  
 2 by the statutory definition of allocation of  
 3 electricity, which explicitly references cost and  
 4 benefits reflected in utility rates, this is exclusively  
 5 a ratemaking exercise. Any attestation should mirror  
 6 the statutory language and not read into the statute  
 7 requirements that do not exist.  
 8 Notably, in several instances, Staff  
 9 rejected proposals from stakeholders to modify statutory  
 10 definitions in the rules, and yet in the case of this  
 11 critical component, Staff has proposed language that  
 12 differs significantly from the language in the statute.  
 13 Finally, PacifiCorp, like several others, is  
 14 concerned about the overall administrative burden of  
 15 these rules, and we look forward to working with the  
 16 Commission, Staff, and stakeholders to find efficiencies  
 17 in the processes and to hopefully find ways to reduce  
 18 and minimize the administrative burden.  
 19 By way of example, PacifiCorp continues to  
 20 be willing to provide a draft IRP as set forth in the  
 21 draft rules, but is concerned that the draft IRP process  
 22 contemplated will not provide meaningful information to  
 23 the Commission, Staff, or stakeholders, and questions  
 24 the value of this requirement.  
 25 Despite the tremendous amount of work that

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1 has already been done to implement CETA thus far, we are  
 2 still in the early stages of grappling with this  
 3 legislation. I recommend the Commission modify the  
 4 incremental cost calculation, strike reference to the  
 5 social cost of greenhouse gases, and accurately reflect  
 6 the statutory language in WAC 480-100-650 Subsection  
 7 3(a). PacifiCorp looks forward to continued engagement  
 8 with the Commission, Staff, and stakeholders as we move  
 9 forward with implementation of CETA, and I thank you for  
 10 your time this morning.  
 11 CHAIR DANNER: All right. Thank you very  
 12 much. And I will be thinking about platypuses or  
 13 platypi for a while now.  
 14 Let me turn to my colleagues. Is there any  
 15 questions for PacifiCorp?  
 16 All right. Hearing none, thank you for your  
 17 comments this morning and thank you for your  
 18 participation throughout, and we will take these under  
 19 advisement.  
 20 Let me next turn to -- I do not see Public  
 21 Counsel on the sign-up sheet. Is Public Counsel here  
 22 and wanting to comment this morning?  
 23 MS. SUETAKE: Yes, Chair Danner, I am here.  
 24 I -- I apologize for informing Staff sort of late in the  
 25 game that I was going to be commenting today.

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1 CHAIR DANNER: You're up.  
 2 MS. SUETAKE: Thank you. Good morning,  
 3 Chair Danner and Commissioners Rendahl and Balasbas. I  
 4 am Nina Suetake of the Public Counsel Unit. And before  
 5 I start, I'd like to thank Staff and all of the  
 6 stakeholders for all the hard work, time, and  
 7 collaboration that has gone into this rulemaking.  
 8 Now, Public Counsel is largely supportive of  
 9 the proposed rules, but have a number of remaining  
 10 concerns that I'd like to raise today.  
 11 First, Public Counsel objects to the use of  
 12 an alternative for the incremental cost calculation  
 13 methodology as allowed by proposed section 660  
 14 Subsection 1(c). Public Counsel agrees with the  
 15 concerns raised by Climate Solutions, NWECC, Renewable  
 16 Northwest, and the Washington Environmental Council, and  
 17 proposes the option to use dispersed methods of  
 18 calculating incremental costs.  
 19 If the utilities are allowed to use an  
 20 alternative methodology, at a minimum, the rules should  
 21 be modified to require the utilities to consider their  
 22 alternative to the method established in rules.  
 23 (Brief interruption).  
 24 MS. SUETAKE: Is that a question?  
 25 CHAIR DANNER: No.

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1 Folks, if you could mute your phones.  
 2 MS. SUETAKE: Thank you.  
 3 Second, Public Counsel disagrees with the  
 4 interpretation of the statute regarding the calculation  
 5 of a cost threshold for use for the alternative  
 6 compliance mechanism. As currently drafted, Section 660  
 7 Sub 2 would compound a utility's CETA-related cost  
 8 increases for the purposes of the cap, significantly  
 9 inflate the cost cap well beyond the 2 percent provided  
 10 in this statute. This statute states that an  
 11 investor-owned utility must be considered in compliance  
 12 with the CETA standard if over the four-year compliance  
 13 period the average annual incremental costs is meeting  
 14 the standard equals, quote, 2 percent increase of the --  
 15 its investor-owned utilities, weather-adjusted sales  
 16 revenue to customers for electric operations above the  
 17 previous year as reported by the investor-owned utility  
 18 in its most recent Commission-based report.  
 19 On its face, the statute is clear that the  
 20 average cost increase is to be compared to fixed dollar  
 21 amount in time, mainly the weather-adjusted sales  
 22 revenue as reported in most recent Commission-based  
 23 report. The statute does not say a 2 percent increase  
 24 over the weather-adjusted sales revenue for all years  
 25 combined plus an additional 2 percent each year, nor

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1 does it say cumulative 2 percent increase or carry over  
 2 the cost from year to year.  
 3 Arguments in favor of the compounded cap  
 4 states that the intent is evidenced in the phrase 2  
 5 percent increase above the previous year. It is not  
 6 enough, however, to cherry-pick language in the statute  
 7 to rationalize the interpretation. At the very least,  
 8 the public deserves a full explanation as to why this  
 9 provision, which on its face reads as a hard 2 percent  
 10 cost cap, should be interpreted in this manner,  
 11 particularly given that this cost cap could have a  
 12 significant impact on customer rates.  
 13 Putting the issue of statutory  
 14 interpretation aside, the proposed methodology creates a  
 15 threshold that assumes that for this purpose of  
 16 calculating that threshold, CETA costs do not change  
 17 over the four years. All potential CETA costs are baked  
 18 into the threshold amount in a cumulative manner over  
 19 the four years. This assumes that all investments will  
 20 be made for four or more years which may or may not be  
 21 the case for operational maintenance costs or for costs  
 22 for low [inaudible] equity-focused projects.  
 23 Additionally, this methodology does not  
 24 explain what should happen to this threshold amount if a  
 25 utility has the GRC in the middle of a four-year period

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1 that then incorporates CETA costs to a utility's actual  
 2 weather-adjusted sales revenue. Each year's threshold  
 3 is calculated as a 2 percent cap on revenue amount to  
 4 the prior year and is carried forward and included in  
 5 the threshold amount for each subsequent year. It is  
 6 unclear if after a GRC the threshold amount would be  
 7 adjusted downward to account for the fact these costs  
 8 are now included in rates in the actual weather-adjusted  
 9 sales revenue or whether these costs will remain in the  
 10 threshold as well as the sales revenue -- as well as the  
 11 sales revenue to be double-counted yet again in the  
 12 subsequent years. Public Counsel did not raise a sole  
 13 objection to the proposed methodology, and we urge the  
 14 Commission to give this matter additional scrutiny.  
 15 Third, proposed section 645 allows for the  
 16 initiation of an adjudication or brief adjudicative  
 17 proceeding to consider the CEIP filing, or CEIP filing,  
 18 sorry. AWEC raised objections to the use of a brief  
 19 adjudicative proceeding for addressing concerns for the  
 20 CEIP. Public Counsel agrees with AWEC and does not  
 21 believe that a brief adjudicative proceeding is the  
 22 appropriate vehicle for these issues nor does the APA  
 23 allow for the use of a brief adjudicative proceeding.  
 24 And then finally, regarding the issue of  
 25 compensation for equity advisor groups. Public Counsel

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1 would like to thank Staff for their diligence about and  
 2 willingness to discuss this issue. We recognize a  
 3 significant discussion is necessary to develop a  
 4 compensation framework that we may not have time for in  
 5 this round of rules. Public Counsel, however, strongly  
 6 believes that basic rule on -- that requires utilities  
 7 to compensate equity advisory group members should be  
 8 included in the rules at this time with the  
 9 understanding additional guidance can be provided later  
 10 after additional workshops and discussions.  
 11 Short of including a rule at this time,  
 12 Public Counsel alternatively requests the development of  
 13 specific next steps that will be undertaken to address  
 14 the need to compensate equity advisory group members in  
 15 order to ensure the participation needed to help the  
 16 utilities meet the equity requirements of CETA.  
 17 Thank you. That is all my comments at this  
 18 time.  
 19 CHAIR DANNER: Thank you very much.  
 20 Are there any questions for Public Counsel?  
 21 All right. Hearing none, thank you so much.  
 22 Let me move, then, to Katie Ware from  
 23 Renewable Northwest.  
 24 MS. WARE: Good morning, Chair Danner and  
 25 Commissioners, and thank you for the opportunity to

1 speak on behalf of my organization. My name is Katie  
2 Ware. I'm the Washington policy manager for Renewable  
3 Northwest, an advocacy organization with a vision that  
4 every home, business, and vehicle in the Northwest be  
5 powered by renewable, affordable, carbon-free  
6 electricity.

7 First, I'd like to thank the Commission and  
8 Staff for their dedicated efforts to engage stakeholders  
9 and develop a strong set of proposed rules in these  
10 combined dockets. We are overall very impressed with  
11 how the rules have evolved and we'd like to again show  
12 support for the Commission's robust reporting  
13 requirements, which effectively aligns integrated  
14 resource planning with clean energy implementation  
15 planning.

16 We also support the proposed rule's  
17 inclusion of the social cost of greenhouse gasses in  
18 utilities' baselines during integrated resource planning  
19 and thus consideration of the incremental cost of  
20 compliance. To that end, we also support the proposed  
21 rules standardized methodology for calculating the  
22 incremental cost of compliance threshold, a methodology  
23 well aligned with the statute.

24 So with the elimination of draft WAC  
25 480-100-660 Sub 1(c) which would allow a utility to

1 Sierra Club, are you there?

2 MR. HOWELL: Yes, I am. Can you hear me?

3 CHAIR DANNER: Yes, good morning.

4 MR. HOWELL: Good morning. Thank you so  
5 much. And thank you, Chair Danner and Commissioners  
6 Rendahl and Balasbas for all the work on this. We know  
7 well that the CETA rules have put a tremendous amount of  
8 pressure on the Utility Commission. You've had to  
9 adjust all your schedules because of it. It is a  
10 landmark rule and a law and it merits all the work that  
11 you've done, a big shout-out to Brad Cebulko and the  
12 team for all the work that you've done. We know this  
13 has been tremendously time-consuming.

14 Also appreciate some of the previous remarks  
15 about [inaudible.] It is going to be -- it's going to  
16 need to be. And so we don't -- we don't see a whole lot  
17 of huge changes now happening on the last day as you  
18 move to adoption. So I wanted to take this opportunity  
19 to take stock of some of the most important things that  
20 now we have to make good on the promise of CETA going  
21 forward, and the thing that raises the most concern for  
22 us is new gas. And a few things about that.

23 You know, the history of the coal plant is  
24 that we invested in them and we were too slow to realize  
25 that they were becoming obsolete. And along that,

1 propose its own alternative methodology for performing  
2 this calculation, we would support the rule's  
3 implementation of incremental cost of compliance  
4 provision. We continue to recommend the Commission  
5 consider more detailed language regarding resource  
6 adequacy requirements as resource adequacy concerns  
7 provide a potential off-ramp from substantive CETA  
8 compliance, and those concerns should be limited to true  
9 reliability concerns, not consequences of outdated  
10 approaches to resource adequacy.

11 We look forward to continued participation  
12 as a stakeholder in rulemakings and processes to  
13 implement CETA including near term discussions around  
14 resource adequacy, consecutive contracts for unspecified  
15 resources, and the use of electricity from clean  
16 resources as it relates to CETA's greenhouse gas neutral  
17 standard.

18 Thank you again for your time this morning,  
19 and that concludes my remarks.

20 CHAIR DANNER: Thank you very much,  
21 Ms. Ware.

22 Commissioners, are there any questions for  
23 Renewable Northwest?

24 All right. Hearing none, thank you so much.  
25 Let me turn now to Doug Howell from the

1 turned into stranded assets and it made it very  
2 difficult for us to be managing our debt schedule. If  
3 we see new gas, we're headed into the same thing. We're  
4 really looking at a scenario here where we could be  
5 seeing a bunch of stranded assets and that's going to be  
6 very costly.

7 There's another piece about gas that we need  
8 to take note of. Puget Sound Energy last December did  
9 an assessment about social cost of carbon and did a  
10 modest increase of upstream emissions with that. It  
11 really changed the wholesale cost of gas around 350 per  
12 thousand cubic feet, million [inaudible] cubic feet  
13 roughly to about \$11. That translates to \$78 a megawatt  
14 hour just for fuel. We did a calculation with a more  
15 robust upstream and it was -- it changed it to 15 for  
16 the cost of wholesale cost of gas making it closer to  
17 \$100 just for fuel.

18 Those costs are real. In fact, what we know  
19 about climate science over the past few decades is that  
20 our estimate of cost impact have always been low. And  
21 the International Panel of Climate Change continues to  
22 increase what they believe are real costs. 74 bucks a  
23 ton in reality is lower than the cost of impacts that  
24 are actually happening. And that really should be  
25 signalling to us that we take a robust inclusion of the

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1 social cost of carbon knowing that even the cost we put  
2 on it now, the price now, is probably low. So we really  
3 encourage that to happen.  
4 And then when you couple that with the  
5 upstream emissions, which the state is currently doing  
6 [inaudible] greenhouse gas accounting project or  
7 program, that, in fact, that those impacts of greenhouse  
8 gas are going to be far greater than we anticipate on  
9 climate. That between the stranded cost we really need  
10 to think twice about going forward with any new gas  
11 whatsoever, which brings me to then how we are going to  
12 make good on the rules being adopted.  
13 The first step will be integrated resource  
14 plan. Even absent CETA, we should be seeing great  
15 increases in clean energy in our IRPs going forward. We  
16 should be seeing much greater energy efficiency,  
17 significant increases in demand response, an aggressive  
18 acquisition of renewables and storage systems to  
19 integrate that. And if we don't, then we're going to be  
20 seeing too many of those costs be uploaded and  
21 transferred into the Clean Energy Implementation Plan  
22 and potentially distorting what those real costs would  
23 be.  
24 The preliminary view of what we're seeing  
25 from the integrated resource plan is that the utilities

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1 are not stepping up to be doing the robust work they  
2 need to be doing on clean energy even if we didn't have  
3 CETA. So we encourage the Commission going forward to  
4 get that very, very hard scrutiny and make sure that it  
5 is sufficient and the initial times are [inaudible] not.  
6 Then we are going to quickly shift into the  
7 Clean Energy Implementation Plan and we are going to  
8 need an equal level of intense scrutiny, and with that,  
9 we want to encourage and ensure that we have robust  
10 public participation in this Clean Energy Implementation  
11 Plan because that will be our first chance to make good  
12 on the promise of CETA.  
13 We've got so much work to do and you have  
14 already done so much work, but we are hopeful that we  
15 can deliver on the promise of CETA. Thank you for all  
16 that you've done.  
17 CHAIR DANNER: All right. Thank you very  
18 much, Mr. Howell.  
19 Commissioners, are there any questions for  
20 the Sierra Club?  
21 Hearing none, appreciate it.  
22 Kelly Hall from Climate Solutions, are you  
23 there?  
24 MS. HALL: I am here.  
25 CHAIR DANNER: Great.

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1 MS. HALL: Good morning, Chair Danner,  
2 Commissioner Rendahl, and Commissioner Balasbas. I'm  
3 Kelly Hall, senior policy manager at Climate Solutions,  
4 and first, I just want to reiterate a lot of comments  
5 that have already been made and thank the Commission and  
6 numerous Staff members who have put just an enormous  
7 amount of time and effort into these rules, especially  
8 on this.  
9 There's a very tight timeline that was  
10 written into the law. This is an incredibly important  
11 transformation law, and at Climate Solutions, we really  
12 believe that a clean grid is the foundation to achieving  
13 our greenhouse gas emissions goals. So in order to  
14 ensure this transition, we really need strong rules that  
15 protect current and future ratepayers.  
16 So overall, we are very supportive of the  
17 rules and do support adoption. First, I just want to  
18 highlight support for the robust planning process, which  
19 we do think is really important in effectuating a  
20 transition that is going to last over three decades.  
21 Secondly, we strongly support the rules of  
22 specificity around the social cost of carbon that it  
23 must be included in the baseline or business as usual  
24 scenario when comparing that scenario to alternative  
25 compliance scenarios. This is a real damage cost of

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1 utility operations that impact Washington ratepayers,  
2 and so we do believe and agree with Staff that it should  
3 be incorporated into the business as usual planning  
4 scenarios.  
5 Lastly, we do strongly support the clarity  
6 on the cost protection formula. We believe that the  
7 formula does meet the intent of the law because the  
8 statute does call for a 2 percent average annual  
9 increase over the previous year, which to us does  
10 indicate that it does compound over time.  
11 We also want to emphasize, as Renewable  
12 Northwest did, the importance of having specificity and  
13 consistency in rules. So while we support the  
14 consistency around the formula, we do have concerns  
15 about the rules allowing for utilities to propose an  
16 alternative methodology because it could reduce the  
17 consistency across utilities in that calculation.  
18 We do still believe that there are some  
19 improvements that could be made to the rules in the  
20 future. We believe the definition of lowest reasonable  
21 cost should incorporate equity and public health as a  
22 part of that standard, would like to see some more  
23 specificity around exactly how the social cost of carbon  
24 is applied in planning to ensure consistency, again,  
25 across the utilities, and we would have liked to have

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1 seen a bit more guidance on how utilities develop their  
2 interim and specific targets.  
3 Lastly, we do look forward to continuing to  
4 engage with the Commission and stakeholders on the  
5 interpretation of use and feel this is a very important  
6 part of the rules to ensure that customers are actually  
7 supplied a hundred percent renewable energy and  
8 nonemitting resources by 2045.  
9 Again, we support the adoption of these  
10 rules today and again we just want to thank you and all  
11 the staff for the attention to detail and hard work that  
12 has been put into these rules thus far. And that  
13 concludes my remarks.  
14 CHAIR DANNER: Thank you very much.  
15 Commissioner, any questions for Kelly Hall?  
16 All right. Hearing none, thank you so much.  
17 Tyler Pepple from Alliance of Western Energy  
18 Consumers, are you there?  
19 MR. PEPPLE: I am here. Good morning, Chair  
20 Danner. I'm going to turn my camera on because I took  
21 the trouble to get out of my sweatpants today and I want  
22 credit for that.  
23 CHAIR DANNER: Well, that's why I have my  
24 camera on too, although I'm not wearing a necktie, so  
25 congratulations to you for going the -- going the extra

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1 step.  
2 MR. PEPPLE: Thank you. That's why I turned  
3 the camera on.  
4 So I appreciate the opportunity to provide  
5 comments on behalf of AWEC today. I think that  
6 you'll -- you'll not be surprised to learn that AWEC  
7 continues to have several concerns to the proposed  
8 rules. And I think, you know, the issue from sort of a  
9 high level is it feels like the rules always seem to err  
10 on the side of forcing investments and increasing costs  
11 rather than protecting customers from the excessive rate  
12 increases, prioritizing oversight a process rather than  
13 operational flexibility for the utilities and making  
14 CETA implementation more complex rather than simplify.  
15 And this is even done through what AWEC  
16 would consider to be some questionable interpretations  
17 of the law. I think, you know, one example is the  
18 incremental cost of compliance, which Avista and  
19 PacifiCorp and Public Counsel have already touched on.  
20 And I won't reiterate what they said, just say that AWEC  
21 agrees with them and would support Avista's suggestion  
22 to continue discussions on that proposal.  
23 You know, another example is as PacifiCorp  
24 mentioned how the rules treat the elimination of coal  
25 from rates in 2025. You know, the -- there's a very

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1 specific definition of what allocation of electricity  
2 means and the rules interpret that a delivery to load  
3 requirement, which we think leaves that definition out  
4 of the statute.  
5 And on top of this, there's been what has  
6 come across as a troubling resistance providing  
7 customers with the protections that the Administrative  
8 Procedure Act guarantees when it comes to review and  
9 approving the utility's CEIPs. As AWEC has argued  
10 several times now, the APA requires a full adjudication  
11 prior to approval of a CEIP. And we appreciate the  
12 movement the rules have made on this issue, but there  
13 still seems to be an attempt to provide an escape hatch  
14 of sorts in the rule's allowance for a brief  
15 adjudicative proceeding, quote/unquote, if appropriate.  
16 Now, we argued in our last set of comments  
17 why a brief adjudicative proceeding is not legally  
18 authorized for CEIPs, but the rules nevertheless  
19 maintain this option. And the rationale given in the  
20 comment matrix was that the Commission might choose to  
21 hold a brief adjudicative proceeding if only one or two  
22 narrow issues are contested. But the response to that  
23 is, you know, how will you know what issues are  
24 contested when you open the proceeding. All we have to  
25 do is show up and say we want an adjudicative

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1 proceeding, which is what the rules currently require.  
2 And if you -- and even if you did know the universe of  
3 potentially contested issues in a CEIP, it still  
4 wouldn't meet the requirements for a brief adjudicative  
5 proceeding because you have to have specifically  
6 identified the CEIP in your procedure rules as  
7 ineligible for the brief adjudicative process, which you  
8 haven't done.  
9 Now, underlying the debate we've had on this  
10 issue seems to be sort an insufficient understanding of  
11 why the adjudicative process exists and why it matters.  
12 It is there to ensure due process, that the rights of a  
13 person are not impacted without giving them the ability  
14 to challenge the evidence, present their own evidence,  
15 and have a decision rendered based on a record.  
16 Through the CEIP process, customers are  
17 looking at potentially substantial rate impacts over  
18 several decades on top of rate impacts associated with  
19 non-CETA-related investments. These customers are  
20 captive to the utilities. If their rates increase too  
21 much, they can't go to some other provider for  
22 electricity. The only recourse they have is to avail  
23 themselves of the administrative process and the rights  
24 and protections it provides.  
25 Now, I would say that just because you open

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1 a full adjudicative proceeding does not mean that all is  
 2 lost and you must hold a full 11-month adjudication for  
 3 every CEIP. There are plenty of examples of  
 4 adjudications that settle early. That can certainly  
 5 happen here too, but let the process play out as it was  
 6 intended to and uncontroversial CEIPs will take care of  
 7 themselves.

8 Now, I'll close just by noting what I think  
 9 you already know, which is that AWEC's members compete  
 10 in a global economy and they are members of AWEC because  
 11 their energy costs are one of, if not the, highest costs  
 12 they have. Their ability and tolerance for absorbing  
 13 increases to their electricity rate is not unlimited.  
 14 At some point that they determine that they can no  
 15 longer be profitable in this state, they will either  
 16 shut down or shift production elsewhere, and that is not  
 17 a cost-free consequence. Not only that it results in  
 18 greater carbon emissions, production shifts to a  
 19 location where the electricity mixed at a higher carbon  
 20 intensity, but the fixed cost of the utility will also  
 21 be shifted to other customers.

22 In some cases, that would not be a minor  
 23 cost shift. Some of these customers represent as much  
 24 as 10 percent of the utilities' entire load in  
 25 Washington. If that load disappears, the cost impact to

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1 other customers will be substantial.

2 So as we go forward and you're asked to  
 3 evaluate the utilities' proposed investments in the  
 4 CEIPs through a full adjudicative process, we implore  
 5 you to keep the cost at the cost impact to customers  
 6 foremost at your deliberations. That concludes my  
 7 comments. Thank you.

8 CHAIR DANNER: All right. Thank you very  
 9 much, Mr. Pepple.

10 Commissioners, any questions for AWEC?  
 11 All right. I am hearing none, so thank you  
 12 again, and I appreciate your -- your dressing up for us  
 13 this morning.

14 So, Court Olson, are you there?  
 15 MR. OLSON: I am sir.

16 CHAIR DANNER: Good morning.

17 MR. OLSON: Good morning. Thank you,  
 18 Commissioners and the UTC Staff for this opportunity to  
 19 comment. My name is Court Olson and I live in Bellevue,  
 20 Washington. For context, I'll give you a little  
 21 background. I'm proud to say I have three degrees in  
 22 engineering and construction management and I'm a  
 23 project management and billing consultant to commercial  
 24 building owners. Also a regular PSE IRP meetings  
 25 participant, and I have a pretty extensive background in

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1 energy efficiency.

2 I have about a dozen brief points to make  
 3 today to share with you. First is just a general  
 4 concern about the potential for investor-owned utilities  
 5 to gain the law and rules as I'm sure you are concerned  
 6 about as well. In general, there needs to be less  
 7 profit motivation for adding generation and transmission  
 8 capabilities and more financial incentive provided for  
 9 utilities to reduce peak load and demand. While I don't  
 10 see that in the CETA rules, I hope in long range view,  
 11 we can -- we can move toward those kinds of incentives  
 12 for utilities.

13 I have concern about load forecasting of the  
 14 utilities and the inflation of demand growth when we  
 15 know the trend in buildings is a downward trend as the  
 16 energy code tightens every three years. Our new  
 17 buildings are going to be less and less demanding  
 18 energy.

19 PSE has repeatedly shown the tendency to  
 20 overstate future power demands and pursue generation in  
 21 transmission infrastructure building when it hasn't  
 22 really proven to be necessary. This happened in several  
 23 of the past IRPs.

24 Another point, there has been use of  
 25 historical weather data that doesn't take into account

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1 the ongoing warming trend that will surely continue into  
 2 the future. So rules should address this and the demand  
 3 forecasting that utilities do.

4 I also have concern that PSE in particular  
 5 is not adequately and rapidly ramping up demand response  
 6 capabilities that would keep peak demand growth in check  
 7 and avoid the necessity for building more  
 8 infrastructure.

9 Another concern I have is about the IRP  
 10 process changing from every two years to every four  
 11 years. Since we have a very critical need to move  
 12 rapidly on this transition to clean energy, it seems all  
 13 the more important to maintain a two-year IRP review  
 14 process.

15 Another concern is about the missing  
 16 definition of greenhouse gas neutral in the 2030 rule.  
 17 I think this needs to be more carefully defined.

18 Another concern is about a definition of  
 19 cost-effective and least cost comparison. In my  
 20 traditional engineering economy education, the formula  
 21 for the time value of money needs to be adjusted today  
 22 to have a very low or even negative discount rate when  
 23 it comes to greenhouse gas emission benefits in the  
 24 comparison of options. I don't see that in the rules  
 25 and I strongly urge you to consider inserting that.

1 Another concern is about the lowest  
2 reasonable cost definition, and the -- those  
3 calculations must include the social cost of carbon as  
4 some other speakers have already said today and I'm sure  
5 you have other comments to that effect. As I read it,  
6 this is in the rules, now, but the social cost of  
7 greenhouse gas emissions is not specifically and clearly  
8 stated in the definition of lowest reasonable cost. So  
9 I hope you can put that in.

10 Finally, one other concern, I -- I wonder  
11 how an -- a utility would actually be required to  
12 respond to public comment. In my experience with the  
13 past three IRPs and Puget Sound Energy, I've seen  
14 questions that aren't really answered by the utility and  
15 they're sometimes circumvented. So I -- I think the  
16 value of public comment is then being eroded. I know  
17 that puts a big burden on the UTC to make sure these  
18 questions or comments are fully addressed, but if not,  
19 we are just not having a good interactive experience  
20 with our for-profit utilities.

21 That concludes my comments today. I really  
22 appreciate the opportunity to address you folks, and I  
23 really appreciate all of the hard work you're doing to  
24 implement the CETA legislation, which is certainly going  
25 to have to continue over the next several years. Thank

1 inputs as well as public inputs.

2 My concern is that any -- any attempts or  
3 any inclusion as systemic exclusionary language in our  
4 policies is a step in the wrong direction. So I would  
5 be very cautious about surveying how advisory groups are  
6 created and formed and make sure that access is really  
7 very open so that it is not exclusionary and to make  
8 sure to take action through advisory rules if it turns  
9 out to be.

10 Another item that I would like to raise to  
11 attention is in the review of the IRP. I understand the  
12 move to review the draft IRP and I'm concerned about  
13 lack of -- what I understand is a lack of acknowledgment  
14 of the utilities' final IRP as in these current set of  
15 rules. I think that as others who participate in IRP  
16 meetings oftentimes issues go unresolved, partly because  
17 of -- of a lack of really engaging on the issues that  
18 are brought up from the public. This merely defers them  
19 into a more complex CEIP adjudicated process and I think  
20 it's in our best interest to try to resolve those issues  
21 and concerns before we get to that point in the process.

22 Cost of -- we've heard referred to the cost  
23 cap today. I really prefer to think of this as a cost  
24 of compliance obligation, and in Senate Bill 5116  
25 Section 6(3)(a), I read that to say that a utility must

1 you so much.

2 CHAIR DANNER: All right. Thank you very  
3 much, Mr. Olson.

4 Are there questions from Commissioners?

5 All right. I'm hearing none, thank you,  
6 Mr. Olson. I appreciate it.

7 Kevin Jones, are you on the line?

8 MR. JONES: Yes, I am. Can you hear me  
9 okay?

10 CHAIR DANNER: Yes, we can. Thank you.

11 MR. JONES: Chair Danner and Commissioner  
12 Rendahl, Balasbas, and folks assembled today, appreciate  
13 the opportunity to provide comment on the adoption  
14 hearing for the rules. I agree with previous comments,  
15 it's a huge undertaking in order to pull together this  
16 degree of complexity and scope. So appreciate the  
17 opportunity to -- to continue to comment and participate  
18 in the process.

19 Couple things that I would like to mention  
20 that are concerns that come to my -- you know, that I  
21 would like to bring to our attention, the latest set of  
22 rules removed public participation language in favor of  
23 advisory group language. See this in 480-100-630. I  
24 believe the intent is good, to help to focus on where  
25 utilities must be paying attention to inputs, technical

1 be found in compliance if over the four-year compliance  
2 period their average annual incremental cost of meeting  
3 CETA standard equals a 2 percent increase in  
4 weather-adjusted sales. This language tells me that a  
5 utility fails to be in compliance if they fail to spend  
6 2 percent of their weather-adjusted sales revenue. So I  
7 would like us to think about this as not a cost cap,  
8 it's not a limit on what utilities can spend, it's an  
9 obligation on what utilities must spend to be found in  
10 compliance.

11 I do agree that we need to keep an eye on  
12 the process for calculation. It's quite complex as we  
13 all know. And I think it's something we should be  
14 very -- pay much attention to.

15 The last comment is social cost of  
16 greenhouse gas. The reference to RCW 19.280.030  
17 Subparagraph 3 does not in my opinion provide sufficient  
18 guidance for how social cost of greenhouse gas is  
19 applied as a cost adder. We've seen some creative  
20 accounting I will call it from some of our utility  
21 involvement and at -- at issue I believe is that the  
22 social cost of greenhouse gas must be applied to the  
23 operation or the variable side of -- of the operation of  
24 the utility. And we've -- we've -- actually one of our  
25 colleagues has posted analysis showing how application

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1 of greenhouse gas to the fixed -- as a fixed cost is not  
 2 really in compliance with the intent of the law.  
 3 So appreciate the opportunity to provide  
 4 comments. I look forward to continuing on as well.  
 5 Thanks for your time.  
 6 CHAIR DANNER: All right. Thank you very  
 7 much.  
 8 Are there any questions for Mr. Jones?  
 9 All right. Hearing none, Jane Linley, are  
 10 you on the line?  
 11 MS. LINLEY: Hello, Commissioner Danner. I  
 12 am.  
 13 CHAIR DANNER: All right. Good morning.  
 14 MS. LINLEY: Morning. So hello,  
 15 Commissioners. Thank you so much for providing this  
 16 hearing. My name is Jane Linley, and I live on  
 17 Bainbridge Island. And Kevin Jones and Court Olson  
 18 stole a lot of my thunder, so instead of just repeating  
 19 exactly what they said, I just wanted to echo what Doug  
 20 Howell said earlier. I think it's really critical that  
 21 we see changes related to CETA in the next IRP such as  
 22 increases in demand response and the acquisition of  
 23 renewable resources.  
 24 So that is all I'm going to add and I just  
 25 want to thank you for considering my concerns.

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1 CHAIR DANNER: All right. Thank you very  
 2 much. Appreciate your participation.  
 3 Commissioners, any questions for Ms. Linley?  
 4 All right. Hearing none, thank you again  
 5 for your participation this morning.  
 6 Eleanor Bastian, are you there?  
 7 MS. BASTIAN: Good morning, yes, I am.  
 8 CHAIR DANNER: Good morning.  
 9 MS. BASTIAN: So thank you, Commissioners  
 10 Danner, Rendahl, and Balasbas, the Staff and the fellow  
 11 stakeholders here today. My name is Eleanor Bastian and  
 12 I'm the climate and clean energy policy manager at the  
 13 Washington Environmental Council. The Washington  
 14 Environmental Council is a state-wide nonprofit that  
 15 works to protect and restore the environment for all  
 16 Washingtonians.  
 17 We work in collaboration and coordination  
 18 with other environmental organizations, environmental  
 19 justice organizations, tribal nations, labor unions,  
 20 businesses, and more to effect change. We have engaged  
 21 along with these partners in this rulemaking process for  
 22 the last 18 months and thank the UTC for today's  
 23 flexibility in accepting written comments. There is  
 24 tremendous interest and excitement across Washington and  
 25 the hundred percent clean transformation.

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1 The Clean Energy Transformation Act is a  
 2 breakthrough climate law and it mandates coal-free  
 3 electricity by 2026, a hundred percent greenhouse gas  
 4 neutral electricity by 2030, and a hundred percent  
 5 greenhouse gas-free electricity by 2045. All achieved  
 6 in a way that advances equity and creates good jobs  
 7 here.  
 8 This law calls on utilities to advance  
 9 equity in the transformation because communities of  
 10 color and people with lower income have borne greater  
 11 burdens and seen fewer benefits from our electricity  
 12 system. Communities of color and people with lower  
 13 incomes have been excluded from engagement and  
 14 decision-making in how we power our communities.  
 15 The legislature tasks the UTC with a  
 16 critical role in the success of this historic law  
 17 setting reporting, planning, and compliance rules for  
 18 the journey to hundred percent clean and making sure  
 19 investor-owned utilities across the state are planning  
 20 and taking equitable actions. We applaud the Commission  
 21 for their leadership in this critical role so far.  
 22 These rules are a strong start for our  
 23 state's journey towards a hundred percent clean and  
 24 equitable electricity by 2045. The rules establish  
 25 clean energy transformation standards for the first time

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1 and set up clear processes and requirements to meet  
 2 them. The rules give strategic direction to utilities  
 3 to ensure all customers are benefitting from this  
 4 transformation.  
 5 In order to achieve a transformation, we are  
 6 going to need communication, consistency, flexibility,  
 7 and accountability. I think these rules keep us on that  
 8 path. We urge the Commission to adaptably manage these  
 9 rules.  
 10 In particular, we support the direction  
 11 given in the rules to measure increases in spending to  
 12 meet the law on a compounding basis. We urge the  
 13 Commission to examine closely utility incremental cost  
 14 cap methodologies to ensure these rules do not create a  
 15 loophole.  
 16 We also urge the Commission to actively  
 17 manage how utilities measure the use of electricity  
 18 under law -- under the law and not rely on guidance for  
 19 implementation.  
 20 With the -- with the hundred percent clean  
 21 law in these rules, we have a real opportunity to make  
 22 progress. Thank you for your efforts. Working  
 23 together, we will confront the challenges of directing  
 24 climate change in a way that invests in people and  
 25 builds a better life for everyone in our state.

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1 This concludes my comments.  
 2 CHAIR DANNER: Thank you very much for your  
 3 comments this morning.  
 4 Are there any questions for Eleanor Bastian?  
 5 All right. I am hearing none. Joni Bosh,  
 6 are you there?  
 7 MS. BOSH: Yes, can you hear me?  
 8 CHAIR DANNER: Yes, I can. Good morning.  
 9 MS. BOSH: Thank you. Good morning,  
 10 Chairman Danner and Commissioners Rendahl and Balasbas.  
 11 For the record, I'm Joni Bosh, a senior policy associate  
 12 with the Northwest Energy Coalition. The Coalition  
 13 supports the rules before you today. We appreciate the  
 14 progress that has been made since this rulemaking began  
 15 and thank Staff for their diligence and thoughtful  
 16 efforts.  
 17 We note a number of positive changes that we  
 18 support such as the inclusion of the customer benefit  
 19 indicators, the framework for determining attributable  
 20 incremental cost, the inclusion of the social cost of  
 21 greenhouse gases and the baseline scenarios, and the  
 22 standardized detailed incremental cost calculation  
 23 methodology. While the incremental cost calculation was  
 24 a contentious issue, we think the rule reflects the  
 25 intention of the act.

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1 We support these rules even as we recognize  
 2 that they are just the first iteration in the inevitable  
 3 evolution that will occur as the IRP, CEIPs and CEAPs  
 4 are developed and implemented. We expect that several  
 5 points will be revisited as the first planning cycle  
 6 unfolds and after the first compliance period.  
 7 We hope that at some point in the next few  
 8 years there will be a serious comparison of the various  
 9 social cost of greenhouse gas methodologies used by the  
 10 utilities and their impacts on planning outcomes, an  
 11 analysis of how well non-energy benefits are captured in  
 12 planning, and frankly a change that requires all future  
 13 scenarios, not just one, to incorporate the best  
 14 available science regarding climate change impacts.  
 15 That's 620(10)(b).  
 16 A few points could benefit now from  
 17 Commission guidance and we respectfully request that the  
 18 adoption order provide such guidance on several issues  
 19 that we noted in our comments of November 12th, 2020,  
 20 which I won't repeat here. But we are also concerned --  
 21 and it may take more than guidance -- about the  
 22 alternative incremental cost calculation option at  
 23 480-100-660(1)(c) that's been mentioned several times  
 24 today.  
 25 It was only introduced in the final draft of

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1 the rules, and so we request the Commission allow a  
 2 utility to use an alternative approach in the first  
 3 planning cycle only if the utility also conducts the  
 4 prescribed calculation that is in 651 above it in order  
 5 to provide a side-by-side comparison of the impact of  
 6 the two approaches. I think that would give the public  
 7 and the Commission a lot of useful information on how to  
 8 address incremental costs.  
 9 So I thank you for this opportunity to  
 10 comment. The Coalition looks forward to working on  
 11 remaining rules over the next year with other  
 12 stakeholders and resolving some continuing issues such  
 13 as those concerning the use of electricity,  
 14 demonstrating consistent compliance with the interim and  
 15 specific targets, and updating resource adequacy  
 16 methodologies. And thank you all for so patiently  
 17 listening this morning.  
 18 CHAIR DANNER: Thank you very much for your  
 19 comments.  
 20 Are there any questions for Joni Bosh?  
 21 Okay. I'm hearing none.  
 22 Simon ffitich, are you there? Simon ffitich?  
 23 MR. FFITCH: Good morning, Commissioners.  
 24 Can you hear me?  
 25 CHAIR DANNER: Yes, we can.

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1 MR. FFITCH: Good morning, Chairman Danner  
 2 and Commissioners Rendahl and Balasbas. We filed  
 3 comments on November 12th in this case. And just to get  
 4 on the record, my name is Simon ffitich and I am here  
 5 representing The Energy Project, an organization that  
 6 speaks for low income customers in Washington.  
 7 I just wanted to highlight one particular  
 8 issue for you in my comments today, and that relates to  
 9 the equitable distribution issue, which is one of the  
 10 chief operating principles of CETA along with the clean  
 11 energy focus. And I appreciate Puget Sound Energy's  
 12 emphasis on that in their initial comments and Eleanor  
 13 Bastian just -- just quite recently also emphasizing  
 14 that.  
 15 The problem I want to highlight for you is  
 16 that I think there is a structural mechanical barrier  
 17 that needs to be fixed in order to really help implement  
 18 the equitable distribution requirements. It's -- we've  
 19 addressed this and I will just underline it again. The  
 20 problem is that during the CETA -- excuse me, the CEIP  
 21 review process, which will happen in the fall, and the  
 22 next cycle is -- let me back up and not just focus on  
 23 the dates.  
 24 The basic point here is that the new CEIP as  
 25 it comes in, comes in six months before the -- any

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1 reporting on progress towards -- towards equitable  
 2 distribution. Under the current rules, there is no  
 3 interim reporting requirement on equitable distribution  
 4 process progress. The only reporting that happens comes  
 5 after the first four years and that is July 1st, 2026.  
 6 That would be the first time there would be a report by  
 7 a utility on its progress towards equitable  
 8 distribution. Again, that's July 1st, 2026.  
 9 Problem with that is that the next CEIP,  
 10 after the one that's imminent here in 2021, gets filed  
 11 six months earlier or even -- actually even earlier than  
 12 that, October 1st, 2025. So the problem is when that's  
 13 being considered in fall 2025, the parties, the  
 14 Commission, the companies will not have the ability to  
 15 really discuss the progress because there will be no  
 16 report available to them at that time.  
 17 We just think that's a real structural  
 18 barrier to actually achieving a tracking progress in  
 19 this area, and it's -- we think it's a pretty easy fix.  
 20 We suggested language to that effect such that when the  
 21 CEIP is filed, it includes a report on progress in the  
 22 past four years so that parties could talk about that as  
 23 they're crafting the new CEIP.  
 24 We recognize that the Staff has not accepted  
 25 that recommendation, and of course we would like the

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1 Commission to reconsider that and think about including  
 2 our recommended language out of our comments. We have a  
 3 proposed change and amendment to -- to the rule 640 Sub  
 4 6 there for your consideration. If the Commission is  
 5 not comfortable doing that right now, we would at least  
 6 request this issue be addressed in the -- in the  
 7 adoption order.  
 8 One of the comments that's been made about  
 9 this is that this is an iterative process and we can  
 10 figure these things out as we go along. That's a fair  
 11 point. We agree with that conceptually. However,  
 12 there's a lot of time here involved. This is four years  
 13 down the road already before we even get to take a look  
 14 at this issue. And if we're -- we sort of get to 2025,  
 15 early 2026 and realize, hey, yeah, this is a real  
 16 problem, basically fixing the process at that point  
 17 could potentially put you in another four-year wait to  
 18 get a better set of reporting progress on equitable  
 19 distribution. So you could be potentially talking about  
 20 eight years before you really get this problem fixed.  
 21 And that's the concern I wanted to highlight for you  
 22 today.  
 23 Other than that issue, we support strongly  
 24 the rules that are before you today. We think there's a  
 25 lot of good components to it and we've highlighted those

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1 in our comments. So with that, I'll -- I'll finish and  
 2 be available for any questions.  
 3 CHAIR DANNER: All right. Thank you very  
 4 much, Mr. ffitich.  
 5 Commissioners, are there any questions for  
 6 Simon ffitich?  
 7 Okay. Hearing none, Elliot Weinstein, are  
 8 you there?  
 9 MS. WEINSTEIN: Yes, I am. Can you hear me?  
 10 CHAIR DANNER: Yes, good morning.  
 11 MS. WEINSTEIN: Good morning. My name is  
 12 Elliot Weinstein and I'm testifying in the capacity as a  
 13 PSE ratepayer. I appreciate that the Commission this  
 14 morning reiterated its requirement to act in the public  
 15 interest under RCW 80.01.040 when it regulates  
 16 utilities. To meet this standard, utilities must  
 17 prudently manage their financial transactions so that  
 18 they charge ratepayers only enough to have fair, just,  
 19 reasonable, and sufficient rates.  
 20 As you know, if not for the Commission's  
 21 intervention in accord with the statute, we ratepayers  
 22 are at the mercy of private investor-owned utility  
 23 monopolies. We can't take our business elsewhere, even  
 24 though a primary duty of these privately owned companies  
 25 is to get the highest possible return for its

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1 shareholders. Therefore, when these utilities testify  
 2 about energy costs, they focus on the costs to the  
 3 ratepayers, dumping it on them as opposed to lower  
 4 shareholder profit.  
 5 In addition, I exhort the Commission to  
 6 require utility transparency in the area of public  
 7 disclosure. Please require that data disclosed by  
 8 utilities be provided and in easily accessible format.  
 9 The rules don't require this.  
 10 I am a retired member of the Washington  
 11 State Bar, and in our court system at all levels it's  
 12 required that data be easily accessible. And this has  
 13 been the case for over 30 years as the bedrock of civil  
 14 procedure. And I'd also add as a charter member of the  
 15 New York bar, it's the same in New York as well at all  
 16 levels.  
 17 So please require that in the course of  
 18 utilities disclosing data to the public, it's -- it not  
 19 be in the stack of unreadable data or -- or things that  
 20 are so disorganized that the public or other groups  
 21 cannot see the details of this. This is an old  
 22 discovery tactic that was -- what's the word --  
 23 corrected in -- in the '70s. And I -- I remember. I'm  
 24 old enough.  
 25 So thank you for listening to my testimony,

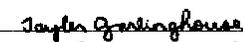
1 and I appreciate all that you've done. Bye-bye.  
 2 CHAIR DANNER: Thank you so much for your  
 3 comments this morning.  
 4 Are there any questions for Ms. Weinstein  
 5 this morning?  
 6 Okay. I am hearing none. That brings us to  
 7 the end of those who have signed up on our sign-in  
 8 sheet. I want to make sure that we are getting everyone  
 9 who wishes to comment this morning. So what I am going  
 10 to do is quickly go through the alphabet and see if  
 11 there is anybody on the call who has not commented this  
 12 morning but would like to.  
 13 So if your last name begins with A through F  
 14 and you would like to comment this morning and have not  
 15 done so, please identify yourself.  
 16 All right. Anyone with the last name  
 17 beginning G through L?  
 18 Anyone with the last name beginning M, N, O,  
 19 P, Q?  
 20 Anyone with the last name beginning R, S, T?  
 21 Anyone with the last names beginning U  
 22 through Z?  
 23 All right, then. I am putting out a last  
 24 call, is there anyone who has not commented this morning  
 25 who wishes to do so?

1 want to thank the Staff for their hard work during this  
 2 really difficult time, managing everything that they  
 3 have to get us to this point. So thank you to the Staff  
 4 and all the stakeholders for your efforts getting us to  
 5 this point.  
 6 CHAIR DANNER: All right. Thank you.  
 7 Commissioner Balasbas, anything you want to  
 8 add before we close?  
 9 COMMISSIONER BALASBAS: Yes. Good morning,  
 10 Chair Danner. I will also turn on my camera briefly  
 11 here this morning. I, like you, Chair Danner, I'm not  
 12 wearing a necktie, I'm also not wearing a coat either,  
 13 but I do have it available if needed.  
 14 But I also want to thank all the commenters  
 15 this morning and for everyone's engagement in this  
 16 process. We -- we do have -- we do have a very I would  
 17 say comprehensive set of rules in front of us for this.  
 18 I do think there are still some issues with some of the  
 19 areas of the rules that I'm hopeful that we can continue  
 20 to work on in the future. And I agree with your  
 21 recommendation, Chair Danner, that we take all the  
 22 comments heard this morning under advisement and that we  
 23 would also adjourn the hearing and again thank everyone  
 24 for participating.  
 25 CHAIR DANNER: Thank you very much,

1 Okay. Hearing nothing, that brings us to  
 2 the end of our comment hearing today. At this point,  
 3 let me turn to my Commissioners.  
 4 Commissioners, it is my intent that we take  
 5 these comments under advisement. We have one more  
 6 comment -- written comment coming in I understand. So  
 7 I -- I think my recommendation is that we adjourn. Is  
 8 there any closing comments you would like to make? Now  
 9 is an opportunity to do so. Commissioner Rendahl or  
 10 Commissioner Balasbas?  
 11 COMMISSIONER RENDAHL: This is Commissioner  
 12 Rendahl and I too will show my camera to show that I  
 13 actually did get dressed up today. I very much  
 14 appreciate all of the comments today and all the  
 15 comments we've heard and read previously and all the  
 16 participation and the discussion.  
 17 As we've heard, some of the topics in this  
 18 monumental law, CETA, are difficult and create some  
 19 implementation issues. Some of them we will continue to  
 20 work on, the use issue in particular, equity issues, and  
 21 participation will be continuing topics that we will be  
 22 working on.  
 23 I appreciate all the thoughts this morning  
 24 and support all of the engagement and passion that  
 25 everyone has brought to this process and particularly

1 Commissioner.  
 2 So we're coming to a close. I want to thank  
 3 everyone on the staff of the UTC and in the Utilities  
 4 and Transportation Division of the Attorney General's  
 5 Office for all the work that they have been doing and  
 6 continue to do in this rulemaking. We know it has been  
 7 a lot, and this is on top of a lot of other work that we  
 8 have been doing. And I want to just really express  
 9 my -- my deep appreciation for the team that we have at  
 10 the UTC, which is really terrific.  
 11 I know that a lot of these issues are very  
 12 contentious, and there are a lot of good arguments on --  
 13 on many sides that we have to weigh and we have to come  
 14 to a conclusion. I want to restate what a lot of the  
 15 commenters said today, which is a restatement of my  
 16 earlier comments, that this is an iterative process. We  
 17 know that there are going to be lessons learned and  
 18 things that we're going to have to do course corrections  
 19 going forward.  
 20 But I also think that right now we are  
 21 coming -- coming into the finish on these. So we will  
 22 take the comments that we receive today under  
 23 advisement. We will come out with our final rules and  
 24 order in due course. And I want to thank everyone again  
 25 for the participation not just today, but for the last

1 18 months.  
2 And with that, we will be adjourned. So  
3 thank you all and have a great day. Thank you.  
4 (Adjourned at 11:10 a.m.)  
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1 CERTIFICATE  
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3 STATE OF WASHINGTON  
4 COUNTY OF THURSTON  
5  
6 I, Tayler Garlinghouse, a Certified Shorthand  
7 Reporter in and for the State of Washington, do hereby  
8 certify that the foregoing transcript is true and  
9 accurate to the best of my knowledge, skill, and  
10 ability.  
11  
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14 Tayler Garlinghouse, CCR 3358  
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