

COMMENT LETTER TO UTILITIES & TRANSPORTATION COMMISSION  
On Draft Rules For The Clean Energy Implementation Planning Required Under The Clean Energy  
Transformation Act

June 2, 2020

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

Re: Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy  
Transformation Act, Docket UE-191023

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Dear Mr. Johnson,

Thank you for the opportunity to submit comments on the implementation of the Clean Energy  
Implementation Plan, Docket UE-191023.

Puget Sound Sage works with Indigenous, Black, Brown, and low-income communities in the South  
Seattle and South King County regions. Research we did in 2019 found that our communities  
overwhelming support the transition to renewable energy but do not have the extra resources to pay for  
increased energy bills. When hit with an energy bill \$50 higher than normal, households report cutting  
basic needs, including heating and cooling, as well as rent/mortgage payments, food, childcare/eldercare,  
and medicines.

Communities of color and low income communities are disproportionately impacted by pollution and  
clean energy alternatives are often out of reach. The Clean Energy Transformation Act's mandate of  
equity means we are closer to having healthier and cleaner air and a just energy transition. Reaching this  
goal, we believe, requires that utilities must plan and work closely with us and our community, actively  
and transparently.

Thank you for including in the draft rules guidance on the inclusion, transparency and enforcement of  
equity, including requiring utilities to:

- Create an Equity Advisory Board that represents environmental justice, highly impacted  
communities and vulnerable populations to provide guidance on and review of planning,  
compliance and progress;
- Ensure public participation and education, submitting public participation plans, as well as  
summary of comments received, reasons for rejecting comments and increasing accessibility of  
information;
- Report their progress toward reducing energy burdens and increasing benefits; and
- Enforcing the equity mandate in 19.405.040(8) by assessing fines for non-compliance.

There are additional important and fundamental ways that the Clean Energy Implementation Plans could  
be stronger on equity, and we submit the following recommendations:

- **Develop specific targets for equity.** The Clean Energy Transformation Act sets forward specific emission reduction benchmarks ensuring clarity of progress and success. We recommend universally adhered to and widely understood goals and metrics to track our progress.
- **Strengthen definitions of equitable distribution** to provide clarity on reducing disparities and ensure **lowest reasonable cost** includes equity so its not used as an excuse for inaction.
- **Create an Equity Advisory Board.** to guide the overall program. We believe our shared success requires a body that can provide expertise and insights to the commission and ensure continuity and use of “best practices” across the energy sector. In addition, the Equity Advisory Boards required for each utility should have the opportunity to connect directly with commissioners (regulators) and provide, as a body, comments in plans and reports.
- **More capacity for communities of color to participate.** In order to effectively, adequately and appropriately engage our communities in public participation, we recommend utilities be required to contract with community based organization(s) with the language capacity, cultural competency and trust needed to educate, reach out to and support their involvement in weighing in on the planning and progress.

We again thank you for the opportunity for us to provide comments to the Commission. Through our statewide coalition, Front and Centered, we are providing specific input on changes to the draft rules and answers to questions for consideration.

Sincerely,

Katrina Peterson, Climate Justice Program Manager