

From: [Kevin Jones](#)
To: [UTC DL Records Center](#)
Subject: Vashon Climate Action Group Docket UE-191023 comments
Date: Tuesday, June 2, 2020 12:35:41 PM

UE-191023: CEIP / CETA Compliance / RCW 80.28 revisions - Vashon Climate Action Group inputs

June 2, 2020

**To: Utilities and Transportation Commission (UTC) Records Center,
records@utc.wa.gov**

From: Vashon Climate Action Group

Regarding: Notice of opportunity to file written comments, Docket UE-191023

The Vashon Climate Action Group (VCAG) welcomes the opportunity to provide written comments regarding the Clean Energy Implementation Plan (CEIP) rulemaking docket UE-191023 Draft Rules. We have chosen to not respond to the questions in the May 5, 2020 notice of opportunity to file written comments.

Two VCAG members are part of the Puget Sound Energy (PSE) Technical Advisory Group (TAG). We participated in the 2017 PSE IRP UTC Hearing and the 2019 PSE IRP planning activity. Our submitted comments are directly informed by participation in these activities.

The work of the Commission, prompted by the passage this year of the Clean Energy Transformation Act (CETA) is important. Legislative changes, embodied in CETA, have long been called for by PSE TAG members. We look forward to supporting the Clean Energy Implementation Plan rulemaking process to assure the intent and practice of CETA are clearly established in the Washington

Administrative Code.

Please do not hesitate to contact me with questions should they arise.

Kevin Jones

Vashon Climate Action Group board member

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Comments on the CEIP Draft Rules

Recommend Lowest Reasonable Cost definition be modified

- Replace “Carbon Dioxide” with “Greenhouse gas”

WAC 480-100-655 (2)

- In addition to items (a) through (d), the utility must include the utility’s percentage of retail sales of electricity met by:
 - Demand response measures
 - Conservation / energy efficiency
 - Market purchases

Section (4) Specific Actions

- The CEIP must also contain:
 - a schedule of utility electricity generation, energy efficiency, demand response, energy storage, energy conservation and transmission assets acquired and assets retired during the implementation period.

Section (5) Presentation of actions and resources

- Each CEIP must also include an assessment of schedule and cost risks & opportunities associated with each asset acquisition and each asset retirement
- **Note:** Alternatively, this provision may be included in Section (11), taking care to include references to both cost and schedule risks.

WAC 480-100-655 Reporting and Compliance

- The Clean energy compliance reports and annual Clean Energy Progress Reports must also contain a report of the amount of gas leaked as a percentage of total gas delivered as measured volumetrically at standard conditions.

WAC 480-100-675

Section (2) – Types of Incremental Costs

- Add “alternative” before the word “lowest” in (2)(c) to assure the additional costs being referred to are over and above the same cost portfolio introduced in section (1)

Section (4) – Reported actual incremental costs

- In (4)(b) replace “equals” with either:
 - “is greater than or equal to”, or
 - “represents at least”