



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

Dear Mr. Johnson,

Please accept the following as our comments on the draft rules for the Clean Energy Implementation Plan, Docket UE-191023.

One America is Washington State's largest immigrant and refugee advocacy organization. We work with Latinx, African and Asian communities all across the state not only on immigrant rights, but we have been a leader on climate and clean energy. Our commitment to justice extends to the rights of communities of color to clean air, affordable clean energy and the opportunities that come with a just transition to a 100% clean energy future. For this reason, we supported and advocated for the passage of the Clean Energy Transformation Act (CETA). It is our continued interest and dedication to the success of this program for our communities that we engage in the implementation.

The communities that we represent shoulder the impacts of pollution generated through the use of dirty energy. Furthermore, our communities struggle to meet the costs of energy and access clean energy alternatives. The unique opportunity of CETA is that the statute mandates equity, ensuring utilities engage, inform, and address the needs of our communities. In the draft rules we are pleased to see that this equity mandate has generally been integrated throughout the planning, compliance, reporting and enforcement through the Clean Energy Implementation Planning (CEIP).

In particular we commend the Utilities and Transportation Commission (UTC) that the rules: require utilities create an Equity Advisory Board to provide guidance and review; requires utilities provide participation and education plans and the summation of comments and reasons for any that are rejected; will provide progress reports on reducing energy burdens and increasing environmental and non-environmental benefits; clarify that UTC will wage penalties for utilities who do not comply with the equity mandate.

With this said however, there are some additional recommendations that would better ensure communities of color are engaged, informed and shaping our state's work to transition to a clean energy future.

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First, CETA sets forth specific and clear goals for emission reductions. We recommend that in order to also meet the equity mandate set forth in statute, UTC set in rule broad goals. UTC in collaboration with Equity Advisory Groups can work together, and with broad public participation, more details to how we can reach these goals. By creating universally understood and measurable goals, we can track our progress, monitor compliance and if necessary issue penalties for non-compliance.

Second, while we commend that each utility is required to create Equity Advisory Boards, we recommend the UTC also create an Equity Advisory Board to provide guidance, recommendations and insights as we implement and over-time discover how we can ensure a just transition and energy benefits for all. And because this activity would tap the expertise of organizations and individuals, we recommend there is compensation and support to play this role for the state.

Third, we support the use of public participation throughout the planning, compliance, reporting, ensuring communities of color are included take more intentional direction. With a diverse state that only stands to become more diverse over the course of meeting our 100% goal, we recommend that utilities be required to contract with community-based organization who are linguistically and culturally capable, as well as trusted, to facilitate and organize the public participation requirements for highly impacted communities.

Finally, because equity is mandated in CETA, we recommend the definition of equitable distribution be clarified around reducing disparities. We also recommend that lowest reasonable costs include equity so as not to be external and used as an excuse for inaction.

We again thank you for the opportunity to provide comments to the UTC. Through our membership of Front and Centered, collectively we will also be providing specific redlines to the draft rules and answers to questions for consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Stolz".

Rich Stolz
Executive Director