

Affiliated Tribes of Northwest Indians
AirWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Allumia
Alternative Energy Resources Organization
Ameresco
American Rivers
Backbone Campaign
Beneficial State Bank
BlueGreen Alliance
Bonneville Environmental Foundation
Byrd Barr Place
City of Ashland
City of Seattle Office of Sustainability & Environment
CleanTech Alliance
Climate Smart Missoula
Climate Solutions
Community Action Center of Whitman County
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
Community Energy Project
Earth Ministry
Ecumenical Ministries of Oregon
eFormative Options
Elevate Energy
Energy350
EnergySavvy
Energy Trust of Oregon
Environment Oregon
Environment Washington
Forth
Global Ocean Health
Green Energy Institute at Lewis & Clark Law School
Grid Forward
Homes for Good
Home Performance Guild of Oregon
Human Resources Council, District 18
Idaho Clean Energy Association
Idaho Conservation League
Idaho Rivers United
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Multnomah County Office of Sustainability
National Center for Appropriate Technology
National Grid
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest EcoBuilding Guild
Northwest Energy Efficiency Council
NW Natural
OneEnergy Renewables
Opportunities Industrialization Center of WA
Opportunity Council
Oracle
Oregon Citizens' Utility Board
Oregon Energy Fund
Oregon Environmental Council
Oregon Physicians for Social Responsibility
Oregon Solar Energy Industries Association
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Portland Energy Conservation, Inc.
Portland General Electric
Puget Sound Advocates for Retirement Action
Puget Sound Cooperative Credit Union
Renewable Northwest
Save Our wild Salmon
Seattle City Light
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Sierra Club, Washington Chapter
Small Business Utility Advocates
Snake River Alliance
Snohomish County PUD
Solar Installers of Washington
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeastern Idaho Community Action Agency
Spark Northwest
Spokane Neighborhood Action Partners
Sustainable Connections
The Climate Trust
The Energy Project
Transition Missoula
UCONS, LLC
Union of Concerned Scientists
United Steelworkers of America, District 12
Washington Environmental Council
Washington Physicians for Social Responsibility
Washington State Community Action Partnership
Washington State Department of Commerce
Washington State University Energy Program
YMCA Earth Service Corps
Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

December 5, 2019

Mark Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Re: Docket No. UE-190908, Pacific Power's Ten-Year Achievable Conservation Potential, Biennial Conservation Target, and Biennial Conservation Plan for 2020-2021

The NW Energy Coalition (NWECC or Coalition) appreciates the opportunity to comment on Pacific Power's (Pacific Power or the Company) 2020-2021 Biennial Conservation Target and Biennial Conservation Plan (BCP). The Coalition is an active participant in the Company's Demand Side Management Advisory Group ("Advisory Group") and in the Company's Integrated Resource Plan Advisory Group, both of which help guide the utility's acquisition of conservation. We were also a participant in the Statewide Advisory Group (SWAG), which discussed issues in 2018 and 2019 related to the treatment of NEEA savings, in addition to other issues of common interest.

The passage of Clean Energy Transformation Act (CETA) underlines the continued importance of conservation and customer-side programs and thus this BCP process: one of the core requirements of CETA is that every utility must reduce or manage their overall load through cost effective, reliable and feasible conservation, energy efficiency and demand response measures, and this requirement in CETA is specifically prior to the requirement to achieve 100% clean energy to meet demand. We understand that, with current rulemakings in process affecting utility resource and system planning, the context in which the Company is developing its 10-year conservation potential, the two-year target, and its BCP are in a state of flux. However, we expect the Company to pursue robust customer-side programs and initiatives to fulfill the intent of CETA, in addition to EIA requirements.

We generally support Pacific Power's initial filing, which has included a social cost of greenhouse gases (GHGs) in the analysis; if any update is needed in Spring 2020 based on new analysis of a social cost of GHGs, we would expect an update along with a description of how the Company would change its programming to reflect that updated number.

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COMMISSION

We appreciate the Company's receptivity to comments and advice from the Advisory Group. Below are a few additional comments for the Company and the Commission to consider.

NEEA Savings

We concur with the agreement made related to the treatment of NEEA savings in an EIA target for 2020-2021, as discussed in the SWAG memo.¹ We would note, however, that with the implementation of new legislation, there may need to be changes in how market transformation savings and achievement will be treated in other utility targets in the future.

Hard-to-Reach and Underserved Markets and Highly Impacted and Vulnerable Communities

In the past few years, stakeholders have spoken about hard-to-reach and underserved markets, and the recent CETA legislation references highly impacted and vulnerable communities, in reference to those being served or not served by clean energy and efficiency programs and their related benefits. While there are some differences in definition for all these terms, we group them together here as there is likely substantial overlap in the kinds of groups who are hard-to-reach or underserved and those who are highly impacted or vulnerable.

Under CETA, one of the intents of the legislation is that all customers, particularly highly impacted and vulnerable communities, will experience equitable energy and nonenergy benefits in the transition to clean energy. Under the 7th Power Plan, there is an acknowledgement that the Region will not be able to meet its efficiency acquisition needs if there are markets underserved by efficiency programming. However, how can these outcomes be measured if we do not have the data? More data and more granular data about customers served and how they are served will become an increasingly important part of measuring program success.

There will many more discussions in the Advisory Group and other regulatory venues on these topics as CETA is implemented. For the upcoming biennium, we request that Pacific Power consider ways to report its program accomplishments in more granular ways—where are participating customers and what are their characteristics? There will likely be a need to collect more information on those customers who are served in order to have a better picture of the needs. This kind of data can help inform a richer discussion on program barriers and opportunities.

The SWAG or another collaborative venue may be a useful group to convene to hold further discussions on data collection and research.

¹ See UE-171087, 2018 Annual Report of Washington State Investor Owned Utility Energy Efficiency Joint Advisory Group Activities and Outcomes, June 11, 2019.

Nonenergy Impacts/Benefits

Related to the above, understanding how nonenergy benefits can flow equitably to all customers will require knowing more about the nonenergy benefits themselves. Staff has proposed some conditions for the utilities related to conducting research on the nonenergy impacts in the coming biennium. We are supportive of these ideas, and encourage Staff to facilitate common venues to discuss this work to minimize duplication.

Other Comments

Pilots: The Company plans to implement a number of pilots in the coming biennium, including on expanded on-bill financing and demand response incentives. We applaud the expansive list of pilots and look forward to hearing lessons learned through the biennium.

Proposed Conditions: Staff has proposed some edits to the conditions that govern the BCPs and Staff and the utilities have iterated on these conditions over the last few months. The NW Energy Coalition has been involved in the discussions and generally agrees with the proposed conditions as provided by Staff on November 27.

Coordination with utilities: As CETA is implemented, there will be more opportunities or needs for joint utility coordination on how to overcome certain program barriers for customers or collect data that will help inform program development. In addition to participating in the SWAG or similar IOU-focused group, we encourage coordination with nearby consumer-owned Washington utilities.

I plan to attend the December 17 recessed open meeting in person.

Respectfully submitted,

Amy Wheelless
Policy Associate