



Creating clean energy communities

June 2, 2020

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

Re: Clean Energy Implementation Plans and CETA Compliance, Docket UE-191023

Dear Mr. Johnson,

Spark Northwest envisions a state powered by equitable clean energy. In our work to develop renewable energy projects, we see many instances where historic and current inequity results in gross disparity in who benefits from clean energy and who is harmed by our reliance on fossil fuels. We are encouraged that the Legislature recognized these disparities and built equitable analysis into how utilities plan and execute our clean energy future. We do not have line-by-line suggestions for the proposed draft rules, but instead offer the following comments about what we see as key considerations.

First, we recognize that Front and Centered is a great resource for this analysis. Their coalition includes many groups with first-hand knowledge of how far we are today from achieving a just transition to clean energy. The policy team at Front and Centered has developed an excellent framework for equitable energy planning and concrete suggestions for how to build that into the rules. We support that framework and plan.

Second, we acknowledge that energy planning is complex, as is resolving disparities in distribution of benefits and harms. Two types of expertise are required to make headway - energy and equity. We support utilities working closely with equity advisory teams throughout their planning and that a statewide equity advisory team provide guidance on evaluation and implementation. To encourage participation and value the time commitment required, we believe the rules should provide for compensation to people serving on those equity advisory teams.

Third, we urge adding concrete guidance that equity impact analysis must be part of each stage of the CEIP process. We support requiring the development of milestones and metrics for modeling, forecasting and evaluation. This is important to ensure our state makes tangible progress towards its goal of an equitable clean energy future.

Thank you for consideration of these comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read "AA", is placed above the typed name.

Andrea Axel
Executive Director

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