

From: [Devon Kellogg](#)
To: [Records Management \(UTC\)](#)
Subject: Comments on U-240281 - INTEGRATED SYSTEM PLAN RULES (480-95 WAC)
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External Email

Comments on U-240281
INTEGRATED SYSTEM PLAN RULES (480-95 WAC)
February 20, 2025

Please update the following sections as noted below:

WAC 480-95-020 Definitions.

(2) "Carbon dioxide equivalent" or "CO₂e" means a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Add: **over a 20 year timeframe.**

WAC 480-95-060 Content of an integrated system plan – implementation section.

(5) (b) (ii) Provide demonstrated material benefits to low-income participants including, but not limited to, decreased energy burden, the addition of air conditioning and backup heat sources using natural gas or energy storage systems, if necessary to protect health and safety in areas with frequent outages, or improved indoor air quality;

Change the last part of the sentence to, "if necessary to protect health and safety in areas with frequent outages, **excessive heat, and/or poor** air quality."

Thank you for your consideration,
Devon Kellogg