

Docket U-240281, Rulemaking required to implement ESHB 1589
February 20, 2025

General comment

Although items such as safety and health costs may be included in a Cost Test, **UTC must not rely on the Cost Test to ensure the achievement of policy goals such as greenhouse gas emissions limits, safety and health, and equity.** The UTC must define a separate process for policy-driven analysis, independent of the Cost Test, to ensure overarching policy goals are implemented.

The analysis from a Cost Test would be of no use if the results did not achieve overarching policy goals, such as greenhouse gas reductions required by law, public health protections, and equity. **The rules for the Cost Test, and other guidance developed by UTC to implement ESHB 1589, must ensure that overarching policy goals are achieved in every portfolio configuration which is considered in the Cost Test.** Physical achievement of these policy goals must be tracked, measured, and verified.

WAC 480-95-030 Cross-cutting assessment and planning requirements.

Require **a collaborative and iterative review process for the Cost Test** that will allow UTC to point out alternatives that were not included and identify problematic inputs or incorrect assumptions, so the utility has the opportunity to verify and agree on changes, and then re-run the Cost Test.

UTC should host and encourage effective public participation.

Require **the use of simple, widely accepted models or tools which everyone understands well.** Please refer to January 18, 2023 Comments of Public Counsel on Straw Proposal, Docket UE-210804. Overarching policy goals of climate emissions, equity, and health, and possibly other cost and reliability goals, will be lost in an overly-complex Cost Test.

Thank you for considering my comments.

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