

June 2, 2020

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Executive Director and Secretary
Washington Utilities and Transportation Commission
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State Of WASH.
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COMMISSION

RE: Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act, Docket UE-191023

Comments by Audubon Washington, Earth Ministry/Washington Interfaith Power and Light, Fuse, RE Sources for Sustainable Communities, Spark Northwest, Vashon Climate Action Group, Washington Environmental Council/Washington Conservation Voters

Dear Mr. Johnson:

Washington must continue to lead in planning and responding to the risks and consequences of climate change, in particular for vulnerable populations and communities disproportionately impacted. The ongoing work to achieve an equitable and impactful implementation of the 2019 Clean Energy Transformation Act is a foundational part of our response. This historic law called for the Utilities and Transportation Commission (UTC) to chart a new course for utilities in Washington. The legislature, in finding that “Washington must address the impacts of climate change by leading the transition to a clean energy economy,” directed the UTC to set rules to guide utilities in achieving 100% clean energy by 2045 by investing in workers and building a more equitable energy system (Findings and Intent, Section 1(1)).

Our organizations offer these comments in response to the Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act, Docket UE-191023. Collectively, we represent hundreds of thousands of people across Washington who support and actively work to achieve equitable climate action, and support a strong rule coming from the UTC to ensure clear and effective regulatory oversight of investor-owned utilities under this law.

We appreciate and support your efforts to shape this transformation in the initial draft rules for Clean Energy Implementation Plans, and see the course already becoming clearer. The rule is strong start in the following areas—

- Sets clear Clean Energy Standards for utilities, so that they must eliminate coal-fired generation, attain greenhouse gas neutrality by 2030, sell only clean electricity to customers by 2045, and do so in a way that advances equity, reliability and affordability;
- Requires meaningful utility planning processes toward the Clean Energy Standards that evaluate key indicators, set clear milestones and identify specific actions towards 100% clean energy;
- Establishes meaningful and regular reporting on milestones, planning and indicators; and

- Sets up processes to hold utilities accountable to the law.

Importantly, we ask you to improve the rule to ensure utilities are building a more equitable 100% clean energy system by—

- Refining key terms to achieve the law, such as “equitable distribution” and “lowest reasonable cost”;
- Adding that utilities must engage and involve customers and stakeholders, especially from highly impacted and vulnerable communities, by identifying barriers to engagement and contracting with community-based organizations that bring expertise, trusted relationships, cultural and linguistic capacity and input;
- Establishing in the rule measurable indicators for vulnerable populations and highly-impacted communities, including health improvements, job training and resilient power;
- Clarifying that utilities must evaluate ahead of time the distribution of benefits and burdens by location and population of planned actions;
- Adding milestones to meet Clean Energy Standards that provide a way for the UTC to measure progress and ensure vulnerable populations and highly impacted communities receive environmental and non-environmental benefits in the transition;
- Adding that utilities must report on indicators and milestones in Biennial CEIP updates, annual clean energy progress reports and clean energy compliance reports to demonstrate compliance with the law; and
- Refining how costs to meet the law are added up to acknowledge the costs of climate change in all scenarios and address historic and current inequities in utility service.

As organizations across Washington committed to addressing the impacts of climate change, we care deeply about how this law is implemented and that our state is moving towards a cleaner and more equitable system. The rules the UTC writes now must chart the course to a clean, safe, fair and resilient electricity for Washington. Thank you for your efforts.

Sincerely,

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