

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-190912, Avista's Ten-Year Achievable  
Conservation Potential, Biennial Conservation Target, and Biennial  
Conservation Plan for 2020-2021*

The NW Energy Coalition (NVEC or Coalition) appreciates the opportunity to comment on Avista Utilities' (Avista 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 Technical Advisory Group (IRP TAG), 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 Avista's initial filing and look forward to an update in the spring of 2020 that includes an updated target that incorporates a social cost of greenhouse gases (GHGs) and description of how the Company will change its programming to reflect that update.

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We appreciate the Company's receptivity to comments and advice from the Advisory Group, and believe the in-person meetings have been a useful venue for information sharing. 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.<sup>1</sup> 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 7<sup>th</sup> 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 Avista find 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.

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<sup>1</sup> 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.

### Pilots

The Company plans to implement a number of pilots in the coming biennium. As lessons are learned, NWEA encourages the Company to share them with the Advisory Group through the biennium. Brief conference calls on particular pilots may be useful. We provide comments on a few of the pilots below:

*Home Energy Audits:* The Company will continue this program in the coming biennium. Based on Advisory Group discussions, it seems like this pilot has been an excellent customer service entry point and opportunity to understand program barriers for certain customer classes. We look forward to more learnings from this program and how to move it or a component of it into a full-fledged program.

*Behavioral Pilot and Bill Notifications:* The NW Energy Coalition is excited by the results in the behavioral pilot and the new interactive billing system that the Company is working on, and looks forward to more information sharing with the Advisory Group.

*Targeted market transformation:* As shared with the Advisory Group and briefly in the BCP, the Company is exploring, with Idaho Power, the idea of a targeted market transformation initiative in Idaho and Eastern Washington. Not much information was available at the time of the last Advisory Group meeting; NWEA encourages the Company to convene the Advisory Group when appropriate to discuss this idea more fully and how it would or would not interact with any funded NEEA work or planned work.

### Other Comments

*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.

*Demand Response:* As the Company takes on demand response programming, it may make sense to at least start the program discussions in the Advisory Group, as the Company

notes in the BCP. The draft findings of the IRP indicate that some demand response programming will be needed beginning in at least 2025, if not sooner. As these programs can take some time to stand-up, we would encourage at least initial discussions in this biennium.

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

Respectfully submitted,

Amy Wheelless  
Policy Associate