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COMMISSION

From: [Kevin Jones](#)
To: [UTC DL Records Center](#)
Cc: [Cebulko, Bradley \(UTC\)](#); [Scanlan, Kathi \(UTC\)](#)
Subject: RE: Docket 191023: Vashon Climate Action Group's Comment in Connection with Proposed WAC 480-100-670 and Public Participation
Date: Monday, June 15, 2020 12:49:22 PM

Thank you for the opportunity to comment regarding the proposed level of public participation in Clean Energy Implementation Plan (CEIP) development under proposed WAC 480-100-670 (WAC). Vashon Climate Action Group (VCAG) strongly supports public participation at the "collaborate" level as defined in the International Association for Public Participation (IAP2) Spectrum.

If incorporated into the CEIP public participation process, the application of "collaborate" under the IAP2 definition, quoted in part below, would require that utilities:

1. actually "...look to the public for advice and innovation..."; and
2. actually incorporate the public's "...advice and recommendations to the maximum extent possible...".

Without this level of public participation mandated by regulation, utilities alone will be the sole decision-maker regarding CEIP contents, merely by stating a reason for rejecting each suggestion. The utility will not need to back up said reason with credible data, subject to review by an impartial third party.

Therefore, VCAG strongly supports the WA State Sierra Club's proposed WAC revision that requires utilities to "collaborate," as defined by IAP2, with the public in developing a CEIP. These proposed revisions provide utility accountability by requiring that utilities disclose sufficient credible evidence to support any reason for refusing public proposals. UTC review will ensure impartiality.

Without these proposed changes, the public will continue to be relegated to the role of "passive observer," without any actual power to affect the formulation of the CEIP. Meaningful public participation needs to be mandated by regulation and enforced by agency review.

Finally, VCAG strongly proposes that public participation at the IAP2 collaborative level be mandated for the Integrated Resource Plan (IRP) process as well. As an important source document to the CEIP, the IRP should be equally informed through public collaboration during its formation.

Kevin Jones

Board Member

Vashon Climate Action Group

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With thanks to Elyette Weinstein