

Affiliated Tribes of Northwest Indians  
AirWorks, Inc  
Alliance to Save Energy  
Alternative Energy Resources Organization  
American Rivers  
Backbone Campaign  
Beneficial State Bank  
BFA Energy  
BlueGreen Alliance  
Bonneville Environmental Foundation  
Byrd Barr Place  
Cascadia Consulting Group  
City of Ashland  
City of Portland Bureau of Planning and Sustainability  
City of Seattle Office of Sustainability & Environment  
Clean Energy Transition Institute  
CleanTech Alliance  
Climate Smart Missoula  
Climate Solutions  
Coffman Engineers  
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  
Electrify Now  
Elevate Energy  
Energy350  
Energy Trust of Oregon  
Environment Oregon  
Environment Washington  
FlexCharging, Inc.  
Forth  
Gallatin Power  
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 XI  
Idaho Clean Energy Association  
Idaho Conservation League  
Idaho Organization of Resource Councils  
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  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest EcoBuilding Guild  
Northwest Energy Efficiency Council  
NW Natural  
Olympia Community Solar  
OneEnergy Renewables  
Opportunities Industrialization Center of WA  
Opportunity Council  
Oracle/Opower  
Oregon Citizens' Utility Board  
Oregon Energy Fund  
Oregon Environmental Council  
Oregon Physicians for Social Responsibility  
Oregon Solar + Storage 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 Hydrogen Alliance  
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 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  
UCONS, LLC  
UMC, Inc.  
Union of Concerned Scientists  
United Steelworkers of America, District 12  
Washington Environmental Council  
Washington Physicians for Social Responsibility  
Washington Solar Energy Industries Association  
Washington State Community Action Partnership  
Washington State Department of Commerce  
Washington State University Energy Program  
Zero Waste Vashon



**NW Energy Coalition**  
for a clean and affordable energy future

February 21, 2023

UE-220974  
UG-220975

**Via Email to UTC Records Center**

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Sq. Loop SE  
P.O. Box 47250  
Lacey, WA 98503

Received  
Records Management  
02/21/23 11:06  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Climate Commitment Act Accounting Petitions (Dockets UE-220974, UG-220975, UG-220759, UG-220926, UG-220803)

Dear Director Maxwell:

The NW Energy Coalition (“NWE” or “Coalition”) appreciates the opportunity to provide comments on the Washington utilities’ petitions for deferred accounting treatment of Climate Commitment Act (CCA) costs and revenues. In addition to raising important policy issues for both electric and gas utility CCA implementation, these petitions present the first opportunity to consider broader implications of the Climate Commitment Act on the gas utility sector. NWE’s comments address each utility-specific forecast as well as relevant policy considerations, as detailed below.

NWE supports the following recommendations of The Energy Project regarding the petitions:

(1) the Commission should direct utilities not to comingle costs and revenues;

(2) the Commission’s orders should include a sunset date for the deferrals and require costs to included in the each utility’s next general rate case.

In addition, we offer the following recommendations:

1. NWECC continues to support the recommendations to the Commission in our July 22, 2022 letter<sup>1</sup> requesting that the Commission determine how utilities should demonstrate that they have met the requirements of RCW 70A.65.120(4) and RCW 70A.65.130(2). The proceeds from the sale of allowances could benefit customers through additional demand-side resource solutions or could be returned to customers in rates, with the first priority being mitigating the long-term program impact or energy burden on low-income customers. Absent guidance from the Commission, we are concerned that each utility will interpret this requirement differently, and stakeholders will have to address this issue on a case-by-case basis when each utility requests cost recovery. This is burdensome on stakeholders and Commission staff, and is likely to lead to disparate treatment and inequitable results for customers.
2. The Commission should not approve requests to defer costs for research and development (“R&D”) for innovative uses and application of hydrogen or other renewable or clean fuels. Research and development of clean fuels should be treated as a general business development and operating expense, and not as a cost of compliance with the Climate Commitment Act.

Sincerely,



Lauren McCloy  
Policy Director  
NW Energy Coalition  
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<sup>1</sup> See July 22, 2022 Letter to Commissioners from NWECC, Climate Solutions, and Washington Environmental Council

