

March 14, 2022

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey WA 98503

Regarding Docket UE-210628
Staff Comments on Avista Corporation's Final CEIP

Ms. Maxwell,

Washington Solar Energy Industries Association (WASEIA) appreciates the opportunity to review your Staff's initial comments on Avista Corporation's Clean Energy Implementation Plan. Our comments will focus on the use of RECs to achieve interim targets, and upon distributed energy resources. It is our belief that much improvement needs to be done on both parts of the plan, and it would appear that we are in agreement with Staff on these matters.

Using the sale of RECs, "banking" RECs, to maintain fossil fuel resources does not move the utility forward toward the 2045 target in the incremental manner intended by CETA. WASIEA is in full agreement with Staff's assessment regarding the pace of the transition if Avista is allowed to move forward with their plan. The time for the utility to begin this transition is now. The ramp up period needs to be steepened considerably.

WASIEA understands the challenge utilities face in making "mindset shift" in their planning for Distributed Energy Resources. Our members are in full agreement of Staff's assessment regarding the work needed on this portion of the CEIP. WASIEA looks forward to participating in DER advisory groups, planning, assessments and hopefully investments in Distributed Energy Resources. We believe that the first step to this transition is to immediately modernize resource modeling with tools such as WIS:dom-P (Vibrant Clean Energy) that model load, grid and renewable energy potential to the neighborhood level and identify where DER+storage deployment is the least-cost investment.

WASIEA looks forward to participating in the ongoing discussion regarding Avista's CEIP

Regards

Gavin Tenold, Member
Washington Solar Energy Industries Association

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