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Washington Utilities and Transportation Commission  
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Re: UTC Docket U-210553

Dear Commissioners Danner, Rendahl, Balasbas, and Ms. White,

Thank you for the opportunity to comment on the Commission's examination of energy decarbonization impacts and pathways for electric and gas utilities to meet state emissions targets, Docket U-210553. It is important work.

As this week's **Sixth Assessment Report** (1) from the IPCC reminds us, the window for stabilizing global warming at 1.5°C is rapidly closing. Here in Washington, it is imperative that we begin decarbonizing our gas industry well before the end of the decade.

**Therefore we urge you to deliver your report to the legislature, in stages if necessary, well in advance of the 2023 session.** The current Q3 2023 delivery date risks delaying action in the legislature until 2024 at the earliest, with implementation delayed until 2025 or later. We can no longer afford to move that slowly.

Additionally, addressing equity in any decarbonization pathway is essential. The best solutions come from those closest to the problem; Washington's policymakers should center the knowledge, experiences and priorities of communities most impacted by climate change, economic injustice and environmental injustice. To guide the Commission's approach we recommend **Equity And Buildings: A Practical Framework for Local Government Decision Makers**, from the Urban Sustainability Directors Network (2).

The criteria, methodology and conclusions of the whitepaper, **Leading with Equity and Justice in the Clean Energy Transition: Getting to the Starting Line for Residential Building Electrification** (3) are relevant to your study, despite their national focus. Key points include: the need to consider 'starting-line' disparities in environmental and social justice communities,

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the need for targeted investments, and the need to progress beyond market-based solutions that favor historically privileged groups.

Cost-benefit analyses should not be based solely on technical considerations; co-benefits need to be considered as well. In their ***Fossil Fuel Workforce Transition Study*** (4), the City of Seattle's Office of Economic Development emphasizes the broader economic value of creating high road labor jobs during a just transition away from fossil fuels. Additional recommendations include district energy systems and aggregated community-scale decarbonization.

The Rocky Mountain Institute's ***Regulatory Solutions for Building Decarbonization*** (5) has ten recommendations for regulators seeking to achieve an all-electric future. The RMI web page cited below also includes a resource library that may be helpful.

While focused on California, ***The Flipside Report: A White Paper on Targeted Geographic Electrification in California's Gas Transition*** (6) contains valuable information, emphasizing the need for a managed transition, halting new investments in future stranded gas assets, and decommissioning gas networks section by section after taking a whole-house approach to electrification. This approach aims to "deliver ratepayer savings, support energy affordability, and improve system efficiency, safety, and resiliency," goals shared by Washington legislators, ratepayers and utilities.

And this week the California Energy Commission has released its final version of their ***Building Decarbonization Assessment*** (7).

Finally, regarding alternative fuels, while 350 Seattle supports the capture and destruction of biomethane, we caution the Commission not to exaggerate the role of renewable natural gas in decarbonization pathways. ***The false promise of "renewable natural gas"*** (8) summarizes pro and con arguments for RNG, concluding that electrification will be healthier, less expensive and more equitable. The article also contains links to several national and state level decarbonization studies that may be helpful for your broader analysis.

And we call your attention to ***How Green Is Blue Hydrogen?*** (9) which finds that "blue" hydrogen, on a lifecycle basis, is even more impactful to the climate than fossil gas.

For the benefit of legislators, we urge you to indicate in your report which alternative fuels and approaches should be considered distractions and false solutions.

Thank you for considering these recommendations and resources.

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References:

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- (2) *Equity And Buildings: A Practical Framework for Local Government Decision Makers*, Urban Sustainability Directors Network, [https://www.usdn.org/uploads/cms/documents/usdn\\_equity\\_and\\_buildings\\_framework\\_-\\_june\\_2021.pdf](https://www.usdn.org/uploads/cms/documents/usdn_equity_and_buildings_framework_-_june_2021.pdf)
- (3) *Leading with Equity and Justice in the Clean Energy Transition: Getting to the Starting Line for Residential Building Electrification*, Green and Healthy Homes Initiative, [https://www.greenandhealthyhomes.org/wp-content/uploads/2021-GHHI-Leading-with-equity\\_wp\\_Final.pdf](https://www.greenandhealthyhomes.org/wp-content/uploads/2021-GHHI-Leading-with-equity_wp_Final.pdf)
- (4) *Fossil Fuel Workforce Transition Study*, City of Seattle Office of Economic Development, [https://www.seattle.gov/Documents/Departments/economicDevelopment/workforce/Attachment%201\\_Fossil%20Fuel%20Study%20CAI.pdf](https://www.seattle.gov/Documents/Departments/economicDevelopment/workforce/Attachment%201_Fossil%20Fuel%20Study%20CAI.pdf)
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- (8) *The false promise of "renewable natural gas"*, David Roberts, Vox.com, <https://www.vox.com/energy-and-environment/2020/2/14/21131109/california-natural-gas-renewable-socalgas>
- (9) *How Green is Blue Hydrogen?*, Howarth and Jakobsen, Wiley Online Library, <https://onlinelibrary.wiley.com/doi/full/10.1002/ese3.956>