



NW Energy Coalition

UE-210830

December 17, 2021

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

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

12/17/21 15:49

Received
Records Management

*Re: NW Energy Coalition's comments on PacifiCorp's 2022-2023 Biennial Conservation Plan,
Docket UE-210830*

Dear Ms. Maxwell:

The NW Energy Coalition ("NWECA") appreciates the opportunity to offer comments on the proposed biennial conservation plan (BCP) from PacifiCorp for 2022-2023. NWECA is an alliance of more than 100 organizations united around energy efficiency, renewable energy, fish and wildlife preservation and restoration in the Columbia basin, low-income and consumer protections, and informed public involvement, all towards the mission of building a clean and affordable energy future. NWECA has been an active participant in PacifiCorp's Energy Efficiency Advisory Group throughout the development of this BCP, and is also active in the integrated resource plan (IRP) process.

We appreciate the Company's thorough filing and the meetings held throughout the year to incorporate advice and share information, as well as provide frequent updates on the impacts of the COVID-19 pandemic on conservation offerings and operations. We offer a few brief comments for consideration.

The passage and implementation of Clean Energy Transformation Act (CETA) underlines the continued importance of conservation and customer-side programs: 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 acquire 100% clean energy to meet demand. The Company has submitted its Clean Energy Implementation Plan (CEIP) in Docket UE-210829; we have submitted comments into that docket about the overall direction that the Company is headed in meeting the intention of CETA, and we look forward to reviewing the final CEIP.

We appreciate that the Company has undertaken work with DNV to assess non-energy impacts (NEI). We think however, that this work is not done, but only the start of the work. The study itself has resulted in what we think are relatively conservative values for NEIs, and we think there is still more work to do to continue developing robust NEIs. We appreciate that all the electric IOUs undertook this work with DNV, but think that there could be more collaboration and transparency throughout the process. Continuation of this work may make sense in a joint venue, amongst all the stakeholders and companies, and we would encourage the Companies to engage stakeholders early in the process.

We understand the proposed conditions for approval are still under review and discussion by Staff and stakeholders. We appreciate Staff's work to finalize these conditions and look forward to any further discussion on these conditions at the open meeting in January.

Thank you for the opportunity to provide comments.

Respectfully,

/s/

Amy Wheelless

Senior Policy Associate

NW Energy Coalition