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State Of Washin.
UTIL. AND TRANSP.
COMMISSION

UE-210878



BLUEGREEN ALLIANCE

WASHINGTON STATE

December 23, 2021

Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98503

RE: Puget Sound Energy's Draft 2022 Distributed Energy Resources Request for Proposals, Docket UE-210878

Dear Chair Danner, Commissioner Rendahl, and Commissioner Balasbas:

On behalf of the BlueGreen Alliance, thank you for the opportunity to provide comment on Puget Sound Energy's Draft 2022 Distributed Energy Resources Request for Proposals.

As a coalition of environmental groups and labor unions that collaborate to address climate change in ways that simultaneously promote economic and social justice, the BlueGreen Alliance applauds Puget Sound Energy for integrating labor standards into the evaluation criteria and scoring as part of the utility's CETA Equity Plan (see Exhibit A, pg. A-11).

This is a critical step to ensure that Puget Sound Energy's investment in distributed energy resources promotes high-road careers. Unless we proactively and intentionally prioritize high-road labor standards in clean energy development, the transition away from fossil fuels will exacerbate growing economic inequality and entrench an unfair economic system based on low-paying jobs with little to no benefits.

Puget Sound Energy can further strengthen its request for proposals by more clearly linking its evaluation criteria and scoring with the labor standards outlined in the Clean Energy Transformation Act. This will provide much needed clarity for developers as to what "labor standards" the utility is referring to and more closely align Puget Sound Energy's resource acquisition with the vision for an equitable energy transition embedded in the Clean Energy Transformation Act.

More specifically, the BlueGreen Alliance recommends that Puget Sound Energy revise the labor standards portion of its evaluation and scoring criteria as follows:

Does the developer intend to comply with labor standards consistent with RCW 82.08.962 and 82.12.962? If yes, provide a summary description.

0 points: No, the developer does not intend to comply with labor standards consistent with RCW 82.08.962 and 82.12.962.

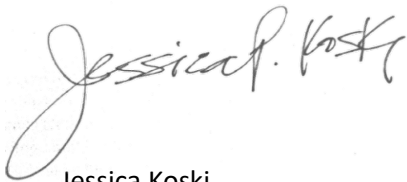
1 point: Yes, the developer intends to comply with labor standards consistent with RCW 82.08.962(1)(c)(i) and RCW 82.12.962(1)(c)(i).

2 points: Yes, the developer intends to comply with labor standards consistent with RCW 82.08.962(1)(c)(ii) and RCW 82.12.962(1)(c)(ii).

4 points: Yes, the developer intends to comply with labor standards consistent with RCW 82.08.962(1)(c)(iii) and RCW 82.12.962(1)(c)(iii).

Thank you again for the opportunity to provide comment and for your consideration. Please do not hesitate to reach out if I can answer questions or provide any additional information. I can be reached at jkoski@bluegreenalliance.org.

Sincerely,

A handwritten signature in black ink that reads "Jessica Koski". The signature is written in a cursive style with a large, looping initial "J".

Jessica Koski
Washington Policy Manager
BlueGreen Alliance