

Service Date: September 14, 2021



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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September 14, 2021

NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS
(By 5 p.m. on Monday, September 27, 2021)

Re: Implementation of RCW 80.28.380,
Dockets UG-210094, UG-210450, UG-210461, and UG-210462

TO ALL INTERESTED PERSONS:

Between June 15, 2021, and August 2, 2021, Cascade Natural Gas Corporation (Cascade), Puget Sound Energy (PSE), Avista Corporation d/b/a/ Avista Utilities (Avista), and Northwest Natural Gas Company d/b/a NW Natural (NW Natural) filed their Conservation Potential Assessments (CPAs) for approval with the Washington Utilities and Transportation Commission (Commission) pursuant to RCW 80.28.380. The CPAs were assigned to Docket UG-210094 for NW Natural, Docket UG-210450 for Cascade, Docket UG-210461 for PSE, and Docket UG-210462 for Avista.

RCW 80.28.380 states that “Each gas company must identify and acquire all conservation measures that are available and cost-effective. Each company must establish an acquisition target every two years and must demonstrate that the target will result in the acquisition of all resources identified as available and cost-effective. The cost-effectiveness analysis required by this section must include the costs of greenhouse gas emissions established in RCW 80.28.395. The targets must be based on a conservation potential assessment prepared by an independent third party and approved by the commission. Conservation targets must be approved by order by the commission. The initial conservation target must take effect by 2022.”

Prior to approval of the first CPAs, the Commission asks for feedback on the following legal and policy questions:

1. Does the requirement to incorporate the social cost of greenhouse gases under RCW 80.28.380 require the utility to use a total resource cost-effectiveness test in identifying cost-effective conservation measures? Please explain your answer.
2. An analysis of the availability of conservation is required under RCW 80.28.380. What considerations should be included in this analysis? Please explain your answer.
3. Must utilities include conservation measures from gas transportation customers in their identification of all conservation measures under RCW 80.28.380? Please explain your answer.

Interested persons may file comments on implementation of RCW 80.28.380 **no later than 5 p.m. on Monday, September 27, 2021**. Pursuant to WAC 480-07-250(3), written comments must be submitted in electronic form, specifically in searchable .pdf format (Adobe Acrobat or comparable software). As provided in WAC 480-07-140(5), those comments must be submitted via the Commission's web portal at www.utc.wa.gov/e-filing. If you are unable to submit documents via the portal, you may submit your comments by email to the Commission's Records Center at records@utc.wa.gov or by mailing or delivering an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- the docket numbers (Dockets UG-210094, UG-210450, UG-210461, and UG-210462),
- the commenter's name, and
- The title and date of the comment or comments.

The Commission will post on its web site all comments that are provided in electronic format.

If you are unable to file your comments electronically the Commission will accept a paper document.

Questions for the Commission regarding the notice should be addressed to Jennifer Snyder by email at jennifer.snyder@utc.wa.gov or by calling (360) 664-1311.

MARK L. JOHNSON
Executive Director and Secretary