



Solar Installers of Washington

November 4, 2019

Mark Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive S.W.
P.O. Box 47250

Olympia, Washington 98504-7250 Re: Docket No. Docket UE-190652 - Comments of Solar
Installers of Washington

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Dear Mr. Johnson,

Solar Installers of Washington (“SIW”) submit the following comments in accordance with the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to Submit Written Comments (“Notice”) issued in Docket UE-190652 on October 4, 2019 regarding the Rulemaking to consider revisions to WAC 480-109 in order to align existing rules with provisions of ESSSB 5116. Pursuant to the Notice, SIW submits the following comments to the questions posed in the Notice:

1. Do stakeholders have concerns with the additions of the statutory definitions for “energy assistance” and “energy burden” in WAC 480-109-060?

SIW Comments: No concerns

2. Questions 2 through 6.

SIW Comments: No comments

7. Do stakeholders have concerns with the additions of the statutory definitions for “carbon dioxide equivalent” and “greenhouse gases”?

SIW Comments: No concerns

8. Do stakeholders have concerns with the changes proposed in WAC 480-109-300? If so, please provide alternative rule language or justifications for retaining the existing language.

SIW Comments: No concerns

9. How should the Commission’s rules specify an emissions rate for greenhouse gas emissions other than carbon dioxide from unspecified electricity? What data source(s) and methodology should the Commission use to establish a default emissions rate from greenhouse gases other than carbon dioxide?



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SIW Comments: If we assume that unspecified electricity is not from a renewable source, then the likely source would be natural gas combustion. The use of natural gas includes the emissions not just from combustion but from the entire system. These other-than-CO2 emissions are quantified in this study from the U.S. Department of Energy: [Greenhouse Gas Emissions and Fuel Use within the Natural Gas Supply Chain](#)¹

10. Should WAC 480-109-300 include language requiring electric companies to report on greenhouse gas emissions occurring during the gathering of fuel for electricity generators?

SIW Comments: Yes, there is energy expended and ‘fugitive emissions’, i.e. methane leakage that should be reported because those emissions are part of the delivery of electricity from fossil fuel sources. These emission levels need to be multiplied by their Global Warming potential. SIW would recommend a GWP of 84 times that of CO2 over a 20-year time horizon per The Intergovernmental Panel on Climate Change’s [Fifth Assessment Report](#) (AR5)². Again these emissions are addressed U.S. Department of Energy which also references the IPCC: [Greenhouse Gas Emissions and Fuel Use within the Natural Gas Supply Chain](#)³

11. Do stakeholders have concerns with any of the proposed changes to chapter 480-109 WAC described in Attachment A?

SIW Comments: No concerns

12. Do stakeholders have suggestions to simplify or clarify the language? None at this time

13. Do stakeholders believe a workshop is necessary for this rulemaking?

SIW Comments: Unsure at this time

14. Are there other definitions from Laws of 2019, Chapter 288, that the Commission should include in chapter 480-109 WAC?

SIW Comments: See comments on #18

15. 15 through 17

^{1,3} Department of Energy, 2015 Paper “Greenhouse Gas Emissions and Fuel Use within the Natural Gas Supply Chain – Sankey

² Intergovernmental Panel on Climate Change Fifth Assessment Report



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SIW Comments no comments

18. and 19. Should planning and reporting requirements for energy efficiency integrate the planning and reporting requirements for demand response and other distributed energy resources? If so, how? Should any of this be addressed in chapter 480-109 WAC?

SIW Comments: How will the Commission address Energy Transformation Projects (ETPs)? Chapter 288, § 4(1)(b)(iii) includes conservation and efficiency “*beyond what is otherwise required under this section*”. Are stakeholders to assume that the Commission will have another rulemaking to address ETPs and would these be added to WAC 480-109-220? Solar Installers of Washington believes it is important that ETPs as defined by RCW 19.405 be incorporated into WAC 480-109 as ETPs can provide direct benefits to customers including a more resilient electrical infrastructure, more weatherized built environment, and a smart grid capable of electric interaction between the utility and stored distributed energy resources.

Thank you for the opportunity to comment,

Jeremy Smithson
Policy Committee Co-Chair
Solar Installers of Washington