

Affiliated Tribes of Northwest Indians
AirWorks, Inc
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
Backbone Campaign
Beneficial State Bank
BFA Energy
BlueGreen Alliance
Bonneville Environmental Foundation
Byrd Barr Place
Cascadia Consulting Group
City of Ashland
City of Portland Bureau of Planning and Sustainability
City of Seattle Office of Sustainability & Environment
Clean Energy Transition Institute
CleanTech Alliance
Climate Smart Missoula
Climate Solutions
Coffman Engineers
Community Action Center of Whitman County
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
Community Energy Project
Earth Ministry
Ecumenical Ministries of Oregon
eFormative Options
Electrify Now
Elevate Energy
Energy350
Energy Trust of Oregon
Environment Oregon
Environment Washington
FlexCharging, Inc.
Forth
Gallatin Power
Global Ocean Health
Green Energy Institute at Lewis & Clark Law School
Grid Forward
Homes for Good
Home Performance Guild of Oregon
Human Resources Council, District XI
Idaho Clean Energy Association
Idaho Conservation League
Idaho Organization of Resource Councils
Idaho Rivers United
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Multnomah County Office of Sustainability
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest EcoBuilding Guild
Northwest Energy Efficiency Council
NW Natural
Olympia Community Solar
OneEnergy Renewables
Opportunities Industrialization Center of WA
Opportunity Council
Oracle/Opower
Oregon Citizens' Utility Board
Oregon Energy Fund
Oregon Environmental Council
Oregon Physicians for Social Responsibility
Oregon Solar + Storage Industries Association
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Portland Energy Conservation, Inc.
Portland General Electric
Puget Sound Advocates for Retirement Action
Puget Sound Cooperative Credit Union
Renewable Hydrogen Alliance
Renewable Northwest
Save Our wild Salmon
Seattle City Light
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Sierra Club, Washington Chapter
Small Business Utility Advocates
Snake River Alliance
Snohomish County PUD
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeastern Idaho Community Action Agency
Spark Northwest
Spokane Neighborhood Action Partners
Sustainable Connections
The Climate Trust
The Energy Project
UCONS, LLC
UMC, Inc.
Union of Concerned Scientists
United Steelworkers of America, District 12
Washington Environmental Council
Washington Physicians for Social Responsibility
Washington Solar Energy Industries Association
Washington State Community Action Partnership
Washington State Department of Commerce
Washington State University Energy Program
Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

February 21, 2023

UG-220803

Via Email to UTC Records Center

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Sq. Loop SE
P.O. Box 47250
Lacey, WA 98503

Re: Climate Commitment Act Accounting Petitions (Dockets UE-220974, UG-220975, UG-220759, UG-220926, UG-220803)

Dear Director Maxwell:

The NW Energy Coalition (“NWECC” or “Coalition”) appreciates the opportunity to provide comments on the Washington utilities’ petitions for deferred accounting treatment of Climate Commitment Act (CCA) costs and revenues. In addition to raising important policy issues for both electric and gas utility CCA implementation, these petitions present the first opportunity to consider broader implications of the Climate Commitment Act on the gas utility sector. NWECC’s comments address each utility-specific forecast as well as relevant policy considerations, as detailed below.

NWECC supports the following recommendations of The Energy Project regarding the petitions:

(1) the Commission should direct utilities not to comingle costs and revenues;

(2) the Commission’s orders should include a sunset date for the deferrals and require costs to included in the each utility’s next general rate case.

In addition, we offer the following recommendations:

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COMMISSION

1. NWECC continues to support the recommendations to the Commission in our July 22, 2022 letter¹ requesting that the Commission determine how utilities should demonstrate that they have met the requirements of RCW 70A.65.120(4) and RCW 70A.65.130(2). The proceeds from the sale of allowances could benefit customers through additional demand-side resource solutions or could be returned to customers in rates, with the first priority being mitigating the long-term program impact or energy burden on low-income customers. Absent guidance from the Commission, we are concerned that each utility will interpret this requirement differently, and stakeholders will have to address this issue on a case-by-case basis when each utility requests cost recovery. This is burdensome on stakeholders and Commission staff, and is likely to lead to disparate treatment and inequitable results for customers.
2. The Commission should not approve requests to defer costs for research and development (“R&D”) for innovative uses and application of hydrogen or other renewable or clean fuels. Research and development of clean fuels should be treated as a general business development and operating expense, and not as a cost of compliance with the Climate Commitment Act.

Sincerely,



Lauren McCloy
Policy Director
NW Energy Coalition
lauren@nwenergy.org

¹ See July 22, 2022 Letter to Commissioners from NWECC, Climate Solutions, and Washington Environmental Council

