

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-220926

**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

Received  
 Records Management  
 02/21/23 11:06  
 State Of WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

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:

1. NWECC continues to support the recommendations to the Commission in our July 22, 2022 letter<sup>1</sup> 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

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

