

COMMENT LETTER TO UTILITIES & TRANSPORTATION COMMISSION
On Second Discussion Draft Rules For The Integrated Resource Plan and Clean Energy Implementation
Plan Required Under The Clean Energy Transformation Act

September 10, 2020

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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Re: Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act, Docket UE-191023 and Relating to Integrated Resource Planning, Docket UE-190698

Dear Mr. Johnson,

Thank you for the opportunity to submit comments on the second discussion draft for the Commission's CETA rules on Integrated Resource Planning and the Clean Energy Implementation Plans.

Puget Sound Sage works with Indigenous, Black, Brown, and low-income communities in the South Seattle and South King County regions. Research we did in 2019 found that our communities overwhelmingly support the transition to renewable energy but do not have the extra resources to pay for increased energy bills. When hit with an energy bill \$50 higher than normal, households report cutting basic needs, including heating and cooling, as well as rent/mortgage payments, food, childcare/eldercare, and medicines.

Communities of color and low income communities are at the frontline of the most harmful effects of climate change and environmental degradation on our health and our safety. Our economic and bodily integrity are being severely weakened at a disproportionate rate by Covid 19 and massive fires, and other foreseeable natural and human-made events exacerbate existing disparities. Laws must promote fair and just solutions that are designed and implemented with the engagement of Indigenous, Black and Brown and People of Color communities.

The Clean Energy Transformation Act's equity mandate means we are closer to having healthier and cleaner air and access to opportunities to benefit from and participate in a just energy transition. Reaching this goal, we believe, requires that utilities must plan and work closely with us and our community, actively and transparently. Thank you for including in the draft rules guidance for utilities on how to meet the 100% clean energy goal in an equitable manner through inclusion, transparency and enforcement.

We appreciate that the Commission's rules for the Integrated Resource Plans and Clean Energy Implementation Plans uphold the principles of equity advanced by CETA in the following areas, and we recommend that they be reinforced to most effectively meet the public interest intent of the law:

- Affirming the principles of restorative justice in the definition of Equitable Distribution;
- Defining clear steps for utilities to measure equity indicators and adopt stringent targets for advancing equity outcomes;

- Requiring that utilities create an Equity Advisory Board that represents environmental justice, highly impacted communities and vulnerable populations to provide guidance on and review of planning, compliance and progress;
- Ensuring meaningful public participation in the requirement that utilities summarize comments received, reasons for rejecting comments;
- Increasing accessibility of information to the public and for Commission use, including for the development of universal standards for equity intervention in the energy sector;
- Supporting the critical equity element of adequate reporting by requiring that utilities report their progress toward reducing energy burdens and increasing benefits; and
- Enforcing the equity mandate in 19.405.040(8) through the accountability mechanism of assessing fines for non-compliance.

We again thank you for the opportunity for us to provide comments to the Commission. Through our statewide coalition, Front and Centered, we are providing specific input on changes to the draft rules and answers to questions for consideration.

Sincerely,

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