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To: Utilities and Transportation Commission (UTC) Records Center, records@utc.wa.gov

From: Vashon Climate Action Group

Regarding: Notice of opportunity to file written comments, Docket UE-190698 and UE-191023, requesting rules change to compel utilities to include analysis and documentation of their Greenhouse Gas emission profile over the 20-year planning period.

The Vashon Climate Action Group (VCAG) welcomes the opportunity to provide written inputs, enclosed, regarding the Electric Integrated Resource plan (IRP) rulemaking docket UE-190698 and the Clean Energy Implementation Plan (CEIP) rulemaking docket UE-191023. Two VCAG members are part of the 2019 Puget Sound Energy (PSE) Technical Advisory Group (TAG). We participated in the 2017 PSE IRP UTC Hearing and the 2019 PSE IRP planning activity. Our submitted inputs are directly informed by participation in these activities.

The work of the Commission, prompted by the passage this year of the Clean Energy Transformation Act (CETA) is important. Legislative changes, embodied in CETA, have long been called for by PSE TAG members. We look forward to supporting the rulemaking process to assure the intent of CETA are clearly established in the Washington Administrative Code.

Please do not hesitate to contact me with questions should they arise. We look forward to participating in hearings and other proceedings to support CETA rulemaking.

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Topic: Utility analysis of greenhouse gas emission timelines.

We applaud the Commission for specifying Integrated Resource Plan (IRP) scenario requirements in the 2nd Draft CETA Rules. Since the intent of CETA is to reduce electricity generation greenhouse gas emissions, the Rules should also require utilities to include a scenario defining their greenhouse gas reduction timeline. This analysis will provide insight to the Commission as it considers adjusting or expediting utility interim and specific target timelines under WAC 480-100-645(2)(a).

To this end, we recommend adding to section WAC 480-100-620 (9):

(c) At least one scenario must depict the range of net greenhouse gas portfolio emissions, over the expected range of portfolio dispatch options over the 20-year IRP planning period, to allow comparison with Washington State approved clean energy policy goals and timelines.

And adding to section WAC 480-100-620 (10):

(i) Complies with all Washington State approved clean energy policy goals and timelines.

For reference, WAC 480-100-620 (9) and (10) are copied below.

(9) Cases, scenarios, and sensitivities. The IRP must include a range of possible future scenarios and input sensitivities for the purpose of testing the robustness of the utility's resource portfolio under various parameters. The IRP must also provide a narrative description of scenarios and sensitivities the utility used, including those informed by the public participation process.

(a) At least one scenario must be the case that describes the alternative lowest reasonable cost and reasonably available portfolio that the utility would have implemented absent the enactment of RCW 19.405.040 and RCW 19.405.050, as described in WAC 480-100-660(1). This scenario's conditions and inputs should be the same as the preferred portfolio except for those conditions and inputs that must change to account for the impact of RCW 19.405.040 and RCW 19.405.050.

(b) At least one scenario must be a future climate change scenario. This scenario should incorporate impacts including, but not limited to, changes in snowpack, streamflow, rainfall, heating

and cooling degree days, and load changes resulting from climate change. The scenario should utilize the best science available.

(10) Portfolio analysis and preferred portfolio. The utility must integrate the demand forecasts and resource evaluations into a long-range integrated resource plan solution describing the mix of resources that meet current and projected needs. Each utility must provide a narrative explanation of the decisions it has made, including how the utility's long-range integrated resource plan solution:

(a) Achieves the clean energy transformation standards in WAC 480-100-610(1)-(3) at the lowest reasonable cost, considering risk;

(b) Expects to serve utility load, measured on an hourly basis, with the output of the utility's owned and market purchases of nonemitting and renewable resources, net of any off-system sales of such resource;

(c) Includes all cost-effective, reliable, and feasible conservation and efficiency resources, using the methodology established in RCW 19.285.040, and demand response;

(d) Considers acquisition of existing renewable resources and relies on renewable resources and energy storage in the acquisition of new resources constructed after May 7, 2019, insofar as doing so is at the lowest reasonable cost, considering risks;

(e) Maintains and protects the safety, reliable operation, and balancing of the utility's electric system, including mitigating over-generation events and achieving the identified resource adequacy requirement;

(f) Achieves the requirements in WAC 480-100-610(4)(c); the description should include, but is not limited to, (i) the long-term strategy and interim steps for mitigating disparities in benefits and burdens for highly impacted communities and vulnerable populations and (ii) the estimated degree to which such disparities will be mitigated over the planning horizon;

(g) Assesses the environmental health impacts to highly impacted communities; and

(h) Analyzes and considers combinations of distributed energy resource costs, benefits, and operational characteristics including ancillary services, to meet system needs.