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Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: U-240281, ESHB 1589 Rulemaking

Dear Mr. Killip:

The Washington Public Utility Districts Association (WPU DA) appreciates the opportunity to participate in the Utility and Transportation Commission's (UTC) process to establish rules to implement ESHB 1589 – supporting Washington's clean energy economy and transitioning to a clean, affordable, and reliable energy future.

We have a single comment. In certain locations, a large utility provides natural gas to households and businesses that receive retail electric service from a different utility. In those instances, a decision by the large utility to cease offering natural gas service will likely affect an increase in the demand for electricity by those customers. The Legislature recognized that this increase in electric load may require the serving utility to evaluate the capacity of their system and, when needed, to upgrade their generating and distribution infrastructure. Section 10 of ESHB 1589 requires the large combination utility to reach out to consumer-owned utilities providing electric service to the affected area and “provide gas delivery data of sufficient granularity for the consumer-owned electric company to assess the sufficiency of the capacity of the electric distribution system to accommodate the additional load from electrification at the circuit level.” We ask that the UTC ensures that the rules implementing ESHB 1589 provide affected consumer-owned electric utilities sufficient forewarning of any change in natural gas service, so they have the time to plan for and implement actions necessary to maintain grid reliability.

Thank you for the opportunity to provide these comments. Please contact me if you have any questions.

Sincerely,



Nicolas Garcia, Policy Director
Washington Public Utility Districts Association