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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

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.

Kevin Jones

Vashon Climate Action Group board member

BSEE, University of Washington

206-463-1766

Kevinjonvash@gmail.com

Topic: Prior submitted inputs that we ask the Commission to reconsider

We are unable to locate 2nd Draft Rule content that reflects our prior Docket UE-190698 and UE-191023 inputs. In some cases, content from the 1st Draft Rules have been removed from the 2nd Draft Rule

document. These items are summarized below, which we urge the Commission to reconsider or retain, as the case may be.

- We recommend the Commission not abandon a hearing of the FINAL IRP. The Final IRP contains the CEAP which informs the CEIP, which the commission is required by CETA to “after hearing, must adopt, reject, or adopt with conditions, by order, interim targets for a clean energy implementation plan for each investor-owned utility”. Review and acknowledgement of the FINAL IRP is an important regulatory step which guides the utility to create an adequate CEAP. The urgency of CETA does not permit an inadequate CEAP, leading to an inadequate CEIP, which would then wait four years for the next IRP cycle.
- The 2nd Draft Rules appear to have discarded the process by which the Commission acknowledges the utility’s IRP. Is this a consequence of removing Commission review of the utility’s FINAL IRP (which we oppose)? If the Commission is not able to restore review and acknowledgement of the utility’s FINAL IRP the rules should clearly state how the Commission will acknowledge the utility’s DRAFT IRP. Our rationale for this recommendation:
 - o The relationship between the IRP and the CEIP should not absolve Commission responsibility to review and take action on the IRP. The inherent complexities of the IRP are compounded by the schedules imposed by the Clean Energy Transformation Act. Since the CEIP is informed by the CEAP, which is contained in the IRP, Commission action on the IRP is an important “quality check” on the overall process. Rationale: If the IRP is not properly developed, the CEIP will not be properly developed. The CETA schedule does not allow mis-steps like this to develop. The rules should not enable them.
- In the context of these recommendations, please also reconsider this recommendation:
 - o The Commission makes recommendations to the utility through the IRP acknowledgement letter. In some cases, the Commission asks specific questions of the utility regarding the IRP Document. In the event the utility fails to answer specific Commission questions in the following IRP Document, that IRP should automatically be not acknowledged and the utility directed to provide a revised IRP which answers the Commissions questions. Rationale: The regulatory authority of the Commission is not effective unless their IRP acknowledgement instructions are followed.
- Public Participation – we endorse the public participation inputs prepared by Jane Lindley and Elyette Weinstein and submitted by Jane Lindley, including these specific provisions:
 - o “Explanations for why any public input was not used” must be a requirement, not an example, in the rules. Failing to require a utility to document their decisions to not include public inputs in their IRP analyses has multiple negative consequences:
 - Sends a clear message to the public that their inputs and concerns are not important enough for Utility’s to explain why they were not implemented
 - Allows unresolved public concerns to propagate into the Clean Energy Implementation Plan review, instead of being effectively addressed at the Integrated Resource Plan review.
 - o Utilities should be required, for all public hearings, to comply with the International Association of Public Participation “involve” level

- Rules should not provide a “menu” of public participation options as the Utility is likely to select the least interactive of the options provided
 - Rules should include a definition of the public participation level, or a clear reference to the International Association of Public Participation Spectrum of public engagement
 - Too often public participation is not explicitly considered as Utility’s create their IRP work plans. The Commission should address this by requiring Utilities to include in their IRP work plan:
 - The proposed method the utility will use to evaluate advisory group technical inputs, including the approach used to achieve consensus on incorporation of advisory group technical inputs in the integrated resource plan analyses.
- Include demand response and transmission resources in the definition of an Integrated Resource Plan
 - Our experience shows that utilities will suppress discussion of electricity distribution / transmission resources if given the opportunity. Given Utility’s own statements, and regional power system analyses that indicate significant transmission resources are needed to transition to renewable, distributed energy systems, it is imperative to clearly indicate that transmission resources are included in a Utility’s Integrated Resource Plan
 - We have also experienced a low adoption rate for demand response for certain Utility’s. Including demand response explicitly in the Integrated Resource Plan definition would direct Utility’s to address demand response more directly.
 - We recommend the following language:
 - "Integrated resource plan" means an analysis describing the mix of conservation and efficiency, generation, distributed energy resources, demand response, transmission and delivery system infrastructure that will meet current and future resource needs and the requirements of chapters 19.280 and 19.405 RCW at the lowest reasonable cost to the utility and its customers and is clean, affordable, reliable, and equitably distributed.