



NW Energy Coalition

January 11, 2024

Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: Comments on Behalf of the NW Energy Coalition on Avista's 2023 CEIP Biennial Update (Docket UE-210628)

Dear Ms. Hunter,

The NW Energy Coalition ("NVEC" or "Coalition") appreciates the opportunity to comment on Avista's 2023 Clean Energy Implementation Plan ("CEIP") Biennial Update.

The Coalition is an alliance of over 100 environmental, civic, and human service organizations, progressive utilities, and clean energy businesses. Our mission is to advance clean, equitable, and affordable energy policies in Washington, Oregon, Idaho, and Montana. We envision the Northwest comprised of communities that benefit from a carbon-free energy system that equitably meets the needs of people and preserves the region's natural resources.

NVEC staff has participated as members of Avista's IRP Advisory Group, Energy Efficiency Advisory Group, and Energy Assistance Advisory Group. We have submitted multiple sets of comments on Avista's 2021 CEIP (Docket UE-210628).

We acknowledge that Avista has increased its interim renewable energy targets in the Biennial Update as compared to the 2021 CEIP filed in June 2022. We applaud this change and encourage the company to continue to serve its customers with its substantial amount of existing clean energy resources already available and new resources in the coming years. The Commission has the crucial responsibility in ensuring Avista and its peer utilities achieve their clean energy targets.

We also appreciate Avista's work to address much of the feedback that we offered the Company in October 2023 on the Draft 2023 CEIP Biennial Update. Our comments below reiterate feedback we provided on the Draft Update as we believe that, while some changes have been made since the Draft Update, a few of our underlying concerns remain.

Condition 5

In its 2023 Biennial CEIP Update and in future CEIPs, Avista will include descriptions of quantitative (i.e., cost based) and qualitative (e.g., equity considerations) analyses that support interim targets to comply with the Clean Energy Transformation Act's (CETA) 2030 and 2045 clean energy standards.

Avista is required to develop interim targets in each CEIP to demonstrate progress toward meeting CETA standards. NWEA appreciates that the Company stays with Commission-approved Interim Renewable Energy Targets. However, Condition 5 clearly states that in the 2023 Biennial CEIP Update and future CEIPs, Avista will include quantitative and qualitative analyses that support interim targets to comply with CETA 2030 and 2045 clean energy standards. The Company did provide quantitative analysis around the opportunity cost of retaining renewable energy credits ("RECs") for CETA compliance. However, the Company did not provide qualitative analysis. At a minimum, Avista should have explained why the settling parties supported the revised interim targets. As laid out in condition 5, qualitative analysis is also an opportunity for the Company to explain how the interim targets are aligned with CETA's equity mandate. Avista could have also explained why the higher ramp rate will not harm low-income and named communities. Due to lacking analysis and explanation, we continue to question whether Avista has complied with condition 5.

In the 2025 IRP/CEIP, Avista will be developing interim targets for the 2026 to 2029 and the post 2030 implementation periods. In future proceedings, Avista and stakeholders should establish interim targets informed by qualitative and qualitative analysis. In the 2025 IRP/CEIP process, NWEA requests that Avista provide expanded quantitative and qualitative analysis around setting Interim Renewable Energy Targets and evaluate a wide range of interim targets in the next IRP/CEIP.

Condition 9

Avista agrees to update and expand its Vulnerable Populations areas within its 2023 Biennial CEIP Update taking into account the additional criteria developed by the EAG and Energy Assistance Advisory Group (EAAG) and to ensure updates are in line with the definition of Vulnerable Populations outlined in RCW 19.405.020(40). Additional work is needed to develop a consistent methodology and data source identification. This additional work is primarily related

to identifying a consistent data source(s) to evaluate each characteristic and then overlaying it onto a map.

Like condition 5, we provided Avista with comments on condition 9 for the draft Update. We recognize the additional explanation that Avista provided for this condition in the final Update. The additional narrative enabled us to understand better which vulnerability characteristics the company identified with its advisory groups as well as how the company plans to use the White House Climate and Economic Justice Screening Tool (“CEJST”) alongside the Washington Department of Health Environmental Health Disparities (“EHD”) mapping tool.

However, uncertainty remains surrounding how exactly Avista will use the vulnerable population characteristics (from Attachment F) to identify the vulnerable populations within its service area. Does the EHD mapping tool or CEJST satisfy each of these characteristics? In reviewing the characteristics in Attachment F, we believe that Avista will need additional resources to identify the full list because some characteristics (e.g., migrant workers, LGBTQIA2S+, houseless populations) cannot be found as a parameter in either tool they’ve identified for use. We are particularly confused by how Avista plans to identify customers with the following characteristics:

- People who fall between the cracks
- Religious and spiritual people
- Undocumented workers

We refer the company again to the work that Puget Sound Energy (“PSE”) is doing to expand its definition of vulnerable populations. PSE’s methodology was approved by the Commission in PSE’s 2021 CEIP— Order 08 in docket UE-210795 (see PSE conditions 9-11). PSE has since been developing and expanding this definition in collaboration with its EAAG and Equity Advisory Group (“EAG”).

Overall, we question whether Avista has complied with condition 9. Avista still needs to complete the update and expansion of its vulnerable populations. Instead, Avista states in its Biennial Update that it plans to complete this condition in the 2025 CEIP: *“The Company intends to use this methodology for identification of Vulnerable Populations in its 2025 CEIP.”*¹

NWEC strongly recommends that the Commission require this work be completed before the filing of the 2025 CEIP to deliver clean energy benefits to vulnerable populations. Avista should consider advancing this work with its EAAG and EAG.

¹ Avista 2023 Biennial CEIP Update, page 51.

Conclusion

We look forward to working with the Company, Commission staff, and other interested parties to further implement the CEIP through the remainder of this implementation period.

Thank you for considering our comments.

Respectfully submitted,

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