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**From:** [Kevin Jones](#)  
**To:** [UTC DL Records Center](#)  
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**Subject:** Notice of opportunity to file written comments, Docket UE-190698 and UE-191023  
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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.

**Particularly due to our Puget Sound Energy IRP experience, we are acutely concerned that the current rules reduce public access to the IRP and CEIP planning phases in favor of “advisory groups”.** This approach to balance public access against utility burden is difficult to defend. Thankfully an equity advisory group is identified in statute. Unfortunately, the proposed rule language acts to restrict public participation, enforcing and maintaining systemic policies which have historically led to disenfranchisement. What access do utility customers have if they do not fit neatly into an “advisory group”. What assurances do we have that impacted and disenfranchised customers will gain access to an “advisory group”? Which utility customers are being excluded, not intentionally, but effectively?

**We urge the Commissioners to restore the public participation language of the prior version of these rules.** Let the public participation process work, openly, for all members of all groups. If subsequent policy guidance is needed to protect utility burdens they may be issued if and as needed. The rules should not contain exclusionary language that promotes and prolongs systemic exclusion.

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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### **We appreciate incorporation of these provisions in the rules**

- Public Participation:
  - Thank you for making “explanations for why any public input was not used” a requirement in the rules.
  - Thank you for requiring utilities to use the International Association of Public Participation “involve” level for all CEIP hearings. We again ask the Commission to extend this same level of public participation to the IRP. Unresolved issues at the IRP level merely manifest in the CEIP, entrenching opposition and making issue resolution that much harder.

### **New concerns that we ask the Commission to address**

- Public Participation:
  - Please retain the public participation language of the 2<sup>nd</sup> Draft Rules. Limiting IRP/CEAP planning participation to “advisory groups” is a disincentive to historically excluded groups. This is particularly inconsistent with the equitable distribution of benefits emphasis of CETA.

### **Prior inputs that we ask the Commission to reconsider**

- The 3<sup>rd</sup> Draft Rules do not include the process by which the Commission acknowledges the utility’s IRP or a utility’s two-year progress report. The rules should clearly state the process by which the Commission will acknowledge the utility’s IRP and progress reports. The prior policy of issuing an acknowledgement letter, at minimum, should be retained in the rules.
- Social cost of greenhouse gas (SCGHG):
  - Consistent application of SCGHG to IRP analyses is important. This key CETA provision should not be left to analytical creativity. Current rules do not accomplish standard application of SCGHG.
  - The rules should require SCGHG be applied as a variable cost adder per our observations submitted in response to the 2<sup>nd</sup> Draft Rules on September 11, 2020 ([191023-190698-SCC as a Fixed Cost Neutralizes Its Impact.pdf](#))