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March 13, 2020

Docket UE-190837

Mark Johnson, Executive Director/Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250
Olympia, Washington 98504-7250

RE: Northwest Energy Efficiency Council Responses on Amending, Adopting, and Repealing WAC 480-107, Relating to Purchases Electricity, Docket UE-190837

Dear Mr. Johnson:

The Northwest Energy Efficiency Council (NEEC) appreciates this opportunity to submit responses to questions on t Amending, Adopting, and Repealing WAC 480-107, Relating to Purchase of Electricity, Docket UE-190837. NEEC is a non-profit trade association that represents over one hundred energy efficiency businesses in Washington and Oregon. We advocate for energy efficiency and smart buildings as critical tools in enabling a clean energy economy in the state. NEEC is providing a response on question 1.b as well as an additional, general comment.

- 1. Question 1: Request for Proposal Evaluation in Complying with RCW 19.405.040(8)**
 - b. What, if any, revisions should be made to the solicitation content requirements in WAC 480-107-025(1) to incorporate the provisions of RCW 19.405.040(8)?**

NEEC believes a modern, clean and efficient electrical grid by necessity will need a broad set of resources upon which it can rely; this should include traditional resources such as centralized generation, as well as behind the customer meter solutions such as conservation and efficiency. We recommend broadening the current language within WAC 480-107-025 to include other distributed energy resources including bundling of customer sited resources such as energy storage, demand response, efficiency and onsite generation behind the meter. We support the specific modifications recommended by Climate Solutions and included below:

(2) The RFP must document that the size and operational attributes of the resource need requested are consistent with the range of estimated new resource needs identified in the utility's [approved Clean Energy Implementation Plan or biennial](#) integrated resource plan [check-in](#).

(3) The RFP must allow any resources that meet a portion of the amount or a subset of the characteristics or attributes of the resource need to bid, including unbundled renewable energy

credits for a renewable resource need; ~~or~~ conservation and efficiency resources, demand response, or other distributed energy resources, regardless of ownership structure, for a capacity need; ~~or other resources identified to ensure an equitable distribution of energy and nonenergy benefits to vulnerable populations and highly impacted communities.~~

Additional General Comments

NEEC believes the investor-owned-utility Conservation Resources Advisory Groups are an excellent framework for stakeholder engagement on ratepayer funded conservation and efficiency programs in general and in terms of how conservation and efficiency will respond to the Clean Energy Transformation Act. We are supportive of competitive procurement models as they enable transparency and encourage innovation; we support a regulatory framework that encourages utilities to competitively procure the majority of their programs.

Thank you for the opportunity to submit these comments.

Sincerely,



Kerry Meade
Executive Director
The Northwest Energy Efficiency Council