

NWEC Response to Request for Information

Docket No.:	UE-220053 & UG-220054	Witness:	Lauren McCloy
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Type:	Bench Request	Responder:	Lauren McCloy
Request No.:	ALJ – No. 1	Email:	lauren@nwenergy.org
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ALJ Bench Request 1:

This bench request concerns the apparent overlap of represented interests stated by The Energy Project and NW Energy Coalition in their requests for case certification.

- (a) Please detail and explain how the overlapping interests represented by The Energy Project and NW Energy Coalition (including low-income and transportation electrification issues) differ and how each intervenor’s specific perspectives on these topics are not adequately represented by the other.
- (b) Where the represented interests overlap (including low-income and transportation electrification issues), please explain how the public interest will benefit from the participation and funding of both intervenors.

Both The Energy Project and NW Energy Coalition should, in addition, be prepared to explain in any future proposed budget in this proceeding how it believes any overlap of represented interests should be addressed in funding budgets and amounts.

Response to ALJ Bench Request 1:

1.

- a. Regarding low-income issues, NW Energy Coalition (“NWEC”) advocates for clean and affordable energy resources, programs, and services that meet the needs of low-income customers. The Energy Project (“TEP”) represents the interests of the Community Action Partnership organizations, which provide low-income energy efficiency and bill payment assistance for clients across Washington State, with a goal of improving affordable access to energy services for low-income households across Washington.

While NWEC has a specific focus on clean and affordable energy, TEP evaluates a broader scope of low-income customer issues in general rate proceedings. TEP is a member of NWEC, and NWEC and TEP often agree on various issues related to low-income customers. However, neither organization can represent the others’ specific perspective in this proceeding, and it is possible that there may be disagreement between the two organizations on issues in this proceeding as they represent different constituencies. TEP represents the specific interests of the Community Action Agencies and their clients, and low-income customers generally. In contrast, NWEC represents a diverse coalition of organizations and individuals who support an equitable transition to clean and affordable energy that protects low-income customers.

In past rate case proceedings NWEC and TEP have focused on different issues. For example, in the Avista 2019 rate case (UE-190334 and UG-190335), NWEC sponsored testimony on the company's revenue decoupling mechanism, gas line extension allowances, energy efficiency programming, and Colstrip obligations, while TEP sponsored testimony on the importance of low-income weatherization and assistance funding to mitigate proposed rate increases.

Regarding transportation electrification ("TE") issues, NWEC advocates for equitable policies and programs that expand TE and increase access to the benefits of TE. NWEC has specific expertise in Washington clean transportation policy, and utility TE programs in Washington state. NWEC members include TE advocates, service providers, and utilities providing TE programs. NWEC regularly advocates for TE policies and budget priorities before the Washington state Legislature, Washington state agencies, and with utilities, and engages with a broad coalition of TE experts and electric vehicle drivers in the region.

Neither organization can represent the others' specific perspective in this proceeding because TEP represents the interests of the Community Action Agencies and their clients, and low-income customers generally, and TEP does not have the same broad focus, representation, and expertise on TE.

- b. The public interest will benefit from the participation and funding of both intervenors because the Commission will hear testimony from a more diverse pool of experts, leading to a more thorough and balanced record.