

November 2, 2016

VIA EMAIL

Chairman Danner
Commissioner Jones
Commissioner Rendahl

RE: UE-161024
Rulemaking for Integrated Resource Planning, WAC 480-100-238, WAC 480-90-238,
and WAC 480-107

Comments of NW Energy Coalition and Renewable Northwest

Commissioners:

We appreciate the opportunity to respond to the Preproposal Statement of Inquiry regarding a possible update and revision of the rules related to the development of integrated resource plans and related bidding processes. This inquiry is timely and needed, as comprehensive planning has become increasingly important and the world in which the rules were initially adopted has changed significantly.

The attached document contains our specific comments and suggestions; these are embedded with the questions listed in the portion of the "Notice of Opportunity to File Written Comments" for ease of reading.

We commend the Commission for inviting the submission of issues not covered by the questions. We raise a number of specific issues that we think should also be considered by the Commission during this review. These range from how resources are evaluated to broadening conservation to consistency in approach.

We look forward to participating in this discussion.

Cordially,

/s/ Joni Bosh
Senior Policy Associate
NW Energy Coalition

/s/ Wendy Gerlitz
Policy Director
NW Energy Coalition

/s/ Michael O'Brien
Senior Policy Analyst
Renewable Northwest

/s/ Dina Dubson Kelley
Chief Counsel
Renewable Northwest