

Affiliated Tribes of Northwest Indians
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Allumia
 Alternative Energy Resources Organization
 American Rivers
 Backbone Campaign
 Beneficial State Bank
 BFA Energy
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Byrd Barr Place
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 CleanTech Alliance
 Climate Smart Missoula
 Climate Solutions
 Community Action Center of Whitman County
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 Community Energy Project
 Earth Ministry
 Ecumenical Ministries of Oregon
 eFormative Options
 Elevate Energy
 Energy350
 EnergySavvy
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 Forth
 Global Ocean Health
 Green Energy Institute at Lewis & Clark Law School
 Grid Forward
 Homes for Good
 Home Performance Guild of Oregon
 Human Resources Council, District XI
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 League of Women Voters Idaho
 League of Women Voters Oregon
 League of Women Voters Washington
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Multnomah County Office of Sustainability
 National Center for Appropriate Technology
 National Grid
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest EcoBuilding Guild
 Northwest Energy Efficiency Council
 NW Natural
 OneEnergy Renewables
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oracle/Opower
 Oregon Citizens' Utility Board
 Oregon Energy Fund
 Oregon Environmental Council
 Oregon Physicians for Social Responsibility
 Oregon Solar Energy Industries Association
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Portland Energy Conservation, Inc.
 Portland General Electric
 Puget Sound Advocates for Retirement Action
 Puget Sound Cooperative Credit Union
 Renewable Hydrogen Alliance
 Renewable Northwest
 Save Our *wild* Salmon
 Seattle City Light
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Small Business Utility Advocates
 Snake River Alliance
 Snohomish County PUD
 Solar Installers of Washington
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeastern Idaho Community Action Agency
 Spark Northwest
 Spokane Neighborhood Action Partners
 Sustainable Connections
 The Climate Trust
 The Energy Project
 Transition Missoula
 UCONS, LLC
 Union of Concerned Scientists
 United Steelworkers of America, District 12
 Washington Environmental Council
 Washington Physicians for Social Responsibility
 Washington State Community Action Partnership
 Washington State Department of Commerce
 Washington State University Energy Program
 YMCA Earth Service Corps
 Zero Waste Vashon



NW Energy Coalition
for a clean and affordable energy future

May 19, 2020

Mark Johnson, Executive Director and Secretary
 Washington Utilities and Transportation Commission
 PO Box 47250
 Olympia, WA 98504-7250

Re: Docket Nos. UE-190912 (Avista Biennial Conservation Plan), UE-190908 (PacifiCorp Biennial Conservation Plan), and UE-190905 (Puget Sound Energy Biennial Conservation Plan) Petitions

The NW Energy Coalition (the Coalition) appreciates the opportunity to comment on the petitions by Puget Sound Energy, Avista, and PacifiCorp to revise or retain their 2020-2021 Biennial Conservation Targets. As our comments are generally overarching to all three companies' petitions and conservation plans, we present our comments jointly here. Our more programmatic comments on the individual biennial conservation plans are reflected in the comments we submitted in December 2019. Herein, we reflect on the incorporation of the social cost of greenhouse gases (aka the "social cost of carbon") and the impacts of the COVID-19 pandemic on conservation programming.

Social Cost of Carbon in Conservation Targets

The Coalition is an active participant in all of the companies' conservation advisory groups and in their Integrated Resources Plan (IRP) processes, both of which help guide the acquisition of conservation. We are also involved in the rulemaking that will implement the Clean Energy Transformation Act (CETA), including UE-190698, the IRP rulemaking.

The three utilities have put forth revised or retained targets that, in some way, incorporate the social cost carbon into their development. The utilities were all at different points of their IRP processes and incorporated the social cost of carbon in different ways, thus this variable's impacts are reflected differently in their conservation targets. The companies' IRPs and associated documentations were not filed with the UTC, which makes reviewing the utility filings this year especially challenging. Consequently, we do not offer specific comments on each utilities' methodology here, as it is transitory.

We expect, once CETA rulemakings are finalized, the next biennial conservation plan cycle will see a consistent methodology of how the social cost of carbon is incorporated. However, given the uncertainty around these current targets and whether they indeed capture all cost-effective conservation that is possible in the biennium, we are pleased to see that all the utilities are aiming higher in their programming targets than in their proposed Commission-approved targets. CETA emphasizes the importance of conservation and customer-side programs, and we expect all of the companies to pursue robust customer-side programs and initiatives to fulfill the intent of CETA, in addition to EIA requirements.

COVID-19 Impacts

Although it is not the subject of this petition, the COVID-19 pandemic is part of the overarching context that must be acknowledged. Since the companies all filed their original Biennial Conservation Plans in the fall of 2019, the COVID-19 pandemic has dramatically changed the economic outlook and the landscape of conservation programming. Beginning in the latter half of March, most efficiency-related work in homes and businesses halted throughout Washington State. This work will slowly restart over the coming months, in line with local and state public health guidance. In discussions with the Puget Sound Energy, Avista, and PacifiCorp, we know that they are adapting programming: streamlining paperwork requirements for trade allies, emphasizing DIY measures for at-home residents, and working with businesses to manage energy use in unoccupied spaces are all proactive things we have heard the companies doing to address immediate needs. We are also starting to hear about strategies for how to “restart”, once it is safe to do so, including revising incentive amounts to provide additional encouragement to what may be a slow market. Ultimately, the impacts on conservation acquisition are unknown for now; it is possible that we may actually see a dramatic increase in energy efficiency, as has been observed during other times of recession, when external funding and action spur more activity.

The barriers and opportunities for conservation programming in the near future may look very different economically, and in the way that people use their homes and places of work. **Going forward, in the midst of and coming out of this crisis, we urge the companies to be as nimble as possible and to adapt programming aggressively, and in coordination with local and state partners.** For example, if state or federal stimulus funds are directed toward building retrofits, leveraging this funding with utility funding, programming, and technical support could result in enhanced efficiency acquisition, while meeting broader policy goals of creating good paying jobs and healthier work and living environments. There may be opportunities yet unknown in this biennium—while we know this makes for a challenging planning environment for utilities, it also provides a space to be creative and innovative in supporting economic rebuilding and recovery efforts.

To be nimble and to adapt programming also requires knowing more about how the conservation programs are serving customers. As we mentioned in our comments in December 2019, one of the intents of the CETA legislation is that all customers, particularly

highly impacted and vulnerable communities, will experience equitable energy and nonenergy benefits in the transition to clean energy. However, to fulfill that intent requires that we have more granular data about the customers being served by existing utility programs. COVID-19 is further deepening economic strain in these highly impacted and vulnerable communities, making it ever more important that they are equitably served by conservation and other clean energy programming. Without more data, however, it is difficult to assess our collective outcomes. **As we continue in the biennium, we reiterate our request that all of the utilities find ways to report program accomplishments in more granular ways—where are participating customers and what are their characteristics?** In addition, the continuing conversation between utilities, UTC staff, and stakeholders about non-energy impacts is even more important and relevant.

I plan to attend the May 21 open meeting virtually.

Respectfully submitted,

Amy Wheelless
Policy Associate