



NW Energy Coalition

for a clean and affordable energy future

Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

July 25, 2022

Re: Reply comments for UE-210804, Staff investigation developing a UTC jurisdictional specific cost-effectiveness test for distributed energy resources incorporating CETA policies.

Ms. Maxwell:

The NW Energy Coalition (“NWECC” or “Coalition”) appreciates the opportunity to provide reply comments for UE-210804 in preparation for the workshop discussion of applicable policy goals, and the full range of utility and non-utility system impacts to include in a cost-effectiveness test.

The Coalition is an alliance of more than 100 organizations united around energy efficiency, renewable energy, fish and wildlife preservation and restoration in the Columbia basin, low-income and consumer protections, and informed public involvement in building a clean and affordable energy future.

We have attached our comments in the spreadsheet as requested and included it as an attachment. A disclaimer we provide in these comments is that this format creates a significant amount of ambiguity. As a result, our responses may change as we receive more detail about the intended use of this document. Additionally, as Staff has determined that this DER process is inclusive of EVs and transportation electrification, we reiterate our earlier comment from December 14, 2021 that we are not certain whether a single jurisdiction cost-effectiveness test is appropriate for all DERs; for example, DERs that build a utility’s load (e.g., transportation electrification) come with different costs and benefits for a utility than a DER that sheds or moves load.

Regards,

Lauren McCloy
Policy Director

Charlee Thompson
Policy Associate

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