

July 31, 2023

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

Re: Climate Solutions' Comments on Docket No. U-210553 - Examination of Energy Decarbonization Impacts and Pathways for Electric and Gas Utilities to Meet State Emissions Targets

Dear Amanda Maxwell,

Thank you for the opportunity to provide comments on the Decarbonization Pathways Dashboard produced under Docket U-210553. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a hub of climate action, and we are at the center of the movement as a catalyst, advocate, and campaign hub. We have, through the Decarbonization Advisory Group, engaged on this docket since it first opened by attending workshops, participating in webinars, and submitting feedback. We look forward to the release of the final report and hope that it addresses many of the concerns provided below.

We would like to provide comment on the stakeholder engagement process as well as the substance of the Dashboard.

I. The Dashboard does not include sufficient information on the data, assumptions, and methodology behind each of the pathways for many stakeholders to leave substantive comments.

Climate Solutions signed onto the letter to the Commission put forth by NW Energy Coalition, Washington Conservation Action, Columbia Riverkeeper, Sightline Institute, 350 Seattle, Washington Physicians for Social Responsibility, and Clean Energy Transition Institute requesting the updated Data, Methods, and Assumptions (DMA) document as well as an opportunity to comment on the final report.

While the first version of the DMA document has been published online, it only describes the data, methods, and assumptions that go into the Business As Usual and Business As Planned pathways. The other three pathways, which include Electrification, Alternative Fuels, and Hybrid, do not have this information available in the DMA report; thus, it is difficult to comment on the results of these analyses. These three pathways also arguably contain the most important information, because they introduce new assumptions whereas the Business As Usual and Business As Planned pathways simply model the effects of Washington's existing policies.

II. The July 18th Workshop on the Decarbonization Pathways Dashboard lacked clarity from the Commission on how comments will be used to inform the final report.

When interested parties requested an extension for comments on the Dashboard, as well as a webinar to answer questions, the Commission graciously provided both. We are thankful to the Commission for granting that request and providing a space for Sustainability Solutions Group (SSG), the contractor responsible for the Dashboard and the report, to answer questions.

However, the Commission did not have staff capacity to remain on the webinar and so key questions went unanswered as SSG was not able to answer questions on behalf of the Commission. Stakeholders were informed that the final report was not ready to be published, and that this would be the final opportunity to provide comments. It is then unclear if these comments will be able to influence the report in any way.

Additionally, the impact of feedback provided throughout the DAG workshops was never made clear. We are grateful for the opportunity to have participated throughout the DAG workshops over the past two years; yet the final assumptions, which would have been informed by DAG feedback, are still unavailable to review or comment on. To round out its two-year-long stakeholder engagement process, the Commission should make both the DMA manual and the final report available for review and comment.

III. In its preliminary findings, the Dashboard prioritizes pathways that rely on alternative fuels whose future availability and prices are uncertain.

In its Alternative Fuels pathway, the Dashboard makes use of renewable natural gas (RNG) and green hydrogen, both of which are available in very limited quantities currently and, expectedly, into the future. RNG brings many of the same hazards that traditional fossil gas does: health hazards inside and outside of buildings. And tax incentives from the Inflation Reduction Act have caused skyrocketing demand for green hydrogen – especially for use in hard-to-electrify sectors such as heavy industry. It is highly unlikely that RNG or green hydrogen will be available for use in homes and buildings in a cost-effective and substantial way.

However, on the Dashboard the Alternative Fuels pathway results in better air quality than and similar cost results to the Electrification pathway. This is in direct conflict with Washington’s State Energy Strategy, which shows the clear benefits of building electrification as the least-cost scenario. Without the updated DMA model, it is impossible to understand which assumptions led to these results – and therefore stakeholders are not able to comment on them. The Commission and SSG have both emphasized how the dashboard is not meant to recommend a certain pathway over another, yet when two pathways have differentially beneficial results when directly compared, it is easy to draw those conclusions. We are concerned that the Dashboard over-prioritizes the Alternative Fuels pathway and that readers of the Dashboard will conclude that it is the preferred pathway, since it seemingly results in better air quality and similar cost contrary to other studies.

IV. Conclusion

Climate Solutions urges the Commission to consider these shortcomings, and to address them by opening the process once more to stakeholder feedback. At the very least, the Commission should publish the updated DMA manual and clarify the assumptions made behind each pathway. We are concerned the Alternative Fuels pathway produces skewed results that compete with the clear benefits of building electrification and urge the Commission to revisit those assumptions.

Thank you for considering these comments.

Sincerely,



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