

Comment

Jim Perich-Anderson

Owner

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Comment Information

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Details

Comments

I am a 40-year Washington resident, retiree from career in energy efficiency and Founder and Publisher of the Electric Equity series. I appreciate the opportunity to comment in the draft Clean Energy Transformation Standards.

Washington state must work with public and private energy utilities to achieve effective deployment of energy-saving measures, both gas and electric, as success requires effective outreach and support from both gas and electric utilities.

The state is to be commended for the increased focus on equity in delivery of Clean Energy and Energy Efficiency. Historically, residential programs have favored owner-occupied housing; equity efforts should focus on reaching the majority of our residents, who are not owner-occupants. Focusing on renters would be of benefit to our citizens of color, a disproportionate number of whom are renters.

A focus on serving moderate income customers is welcome as well as a substantial number of Washington residents fall in this category.

Our energy utilities, local and state governments, and other interested public and private entities should be working together to create a unified, forward-looking climate safety plan that includes

transition to electrification.

The Northwest Power Planning and Conservation Council. PSE and other energy planning entities apply traditionally accepted planning scenarios based on taking business-as-usual approaches to providing energy and energy efficiency; it seems to reflect the best that the region can do absent any bold leadership to advance climate safety and resiliency. Washington state should work with future-oriented public and private entities, urban and regional planners and to develop an aspirational scenario that would reflect the vision of state and local leaders and their constituencies pursuing carbon-safe futures.

Washington state should accelerate its efforts, and engage various stakeholders, in developing values for non-energy-benefits, and in identifying and pursuing co-benefits of various energy efficiency and clean energy efforts.

For example, PSE has a record of success in working with the King County Housing Authority to provide residential retrofits that provide health and safety as well as energy saving benefits; by providing valuation of additional benefits across all programs including job creation, carbon reduction and climate resiliency, PSE and other utilities can capture a more accurate assessment of cost-effectiveness to recognize the true contribution of energy efficiency and clean energy to the health of the public and the climate.

Adopt and clear a definition of the word equity. I suggest the following definition, found in the Independent Sector website, 'Why Diversity, Equity, and Inclusion Matter':

'Equity is the fair treatment, access, opportunity, and advancement for all people, while at the same time striving to identify and eliminate barriers that have prevented the full participation of some groups. Improving equity involves increasing justice and fairness within the procedures and processes of institutions or systems, as well as in their distribution of resources. Tackling equity issues requires an understanding of the root causes of outcome disparities within our society.'

<https://independentsector.org/resource/why-diversity-equity-and-inclusion-matter/>

Any Clean Energy Planning process would do well to adopt stakeholder recommendations for addressing Equity that were identified in the more 2021 Northwest Power Plan process:

- Account for economic impacts of resource planning
- Develop educational resources for incorporating DEI in power planning
- Apply an equity lens or toolkit to each component of the Plan
- Adopt the role of a clearing house for equity data or support the creation of a separate consortium, after identifying gaps in data, research, and knowledge
- Direct qualitative research by regional organizations or universities related to equity in power planning
- Additional outreach options:
 - Give community participants in the power planning process sufficient notice and expand the timing and location options for meetings
 - Develop a public equity "comment box" in a prominent place on the Council's website

Washington state clean energy/energy efficiency efforts should include:

- Phasing out the current residential retrofit program which unfairly disadvantages renters and people of color. Review all current and planned energy efficiency/clean energy offerings for equity deficiencies and take steps to correct them.
- Pursuing changes in State and Federal policies to accelerate retrofit programs for rental housing.
- Applying a provisional 'non-energy' adder to place initial values on health, climate, community resiliency, species protection and other key equity amenities. This would be additional to the environmental adder instituted at the inception of the Plan. This would address a shortcoming of the current Plan, which by deferring development of specific monetary values for non-energy amenities defaults the value of these amenities to zero.
- Adjusting the avoided cost value for non-carbon sources to reflect the urgent need to reduce climate damage

Clean energy/ energy efficiency efforts should enhance the ability of Washington residents to reach toward equity.

This should include:

- Engage planners and designers actively engaged in designing the cities of the future to better understand the opportunities and constraints to plan for.
- Leverage measure co-benefit values (i.e. of increased community safety due to lighting upgrades) that increase the viability and diffusion of equity-enhancing measures.
- Develop an equitable energy scenario that includes but is not limited to residential time of use rates,


robust residential retrofit programs, propane and gas heat phaseouts, removal of Snake River dams, and additional provisions stemming from emerging state and local policies.

Efforts should be bold, supporting and aspirational and inspirational.

The suggestions above, by positioning the region toward equity, will more completely value and capture the full of range of energy efficiency opportunities, carrying us toward a cleaner and fairer future.

Lastly, as noted by the Governors of Washington and California and others, we are in climate emergency. The State's efforts must transcend politics. Accordingly, please accept the song 'Belief', by Jonathan Mayer, as my final remark:

<https://youtu.be/iqDm1IDgq9c>

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