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September 21, 2021

**Filed Via UTC e-filing center
And via e-mail at records@utc.wa.gov**

U-210553

Received
Records Management
09/21/21 15:46:56
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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

Re: NWGA Comments on Draft RFP, pursuant to Docket U-210553

Dear Amanda,

The Northwest Gas Association (NWGA) represents the distribution companies and transmission pipelines that serve warmth and comfort to 3.5 million residential consumers in Washington State. Our members also deliver heat and productive energy to more than 100,000 commercial businesses and almost 3,500 industrial facilities that employ hundreds of thousands of Washingtonians.

We appreciate the opportunity to respond to the Washington Utilities and Transportation Commission (UTC) regarding the UTC’s draft Request for Proposals (RFP) pursuant to Docket U-210553, relating to the *Commission’s Examination of Energy Decarbonization Impacts and Pathways for Electric and Gas Utilities to Meet State Emissions Targets*.

We continue our support for an open, transparent and collaborative study process that comprehensively considers Washington’s complete energy system (both natural gas and electric) in determining the most efficient and practical pathways to decarbonization, fairly evaluating the impact to energy consumers, ratepayers, the economy, utilities, and disadvantaged communities.

An open, transparent and collaborative study process does not rely on assumptions that result in a preferred or predetermined outcome. Rather, such a process focuses on an objective, rigorous, data driven method that carefully considers different decarbonization pathways. It is our expectation that stakeholders will be given full and complete access to all data, assumptions, inputs and results used during this process and by the chosen vendor in the examination.

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To that end, after examining the published draft RFP, NWGA submits the following comments:

- There must be public and stakeholder participation in the vendor selection process.
 - The public should be able to review submitted proposals.
 - All other non-confidential proposal information should be available for public review.
 - There should be an opportunity for stakeholders to provide comment on submitted proposals and vendor qualifications.
 - There should be a mechanism for stakeholders to make recommendations on potential vendors from which to request proposals.

- The vendor selection process should weight its scoring to favor vendors with demonstrated Pacific NW experience regarding energy system planning, to ensure the findings and solutions reflect the unique challenges of our region – our economy, businesses, climate, people, utilities, geography, etc.

- The details regarding the scope of work in the draft RFP are inadequate.
 - To further transparency and collaboration, the Commission should make additional details about its proposed workplan, procedural approach and timelines publicly available as soon as practicable.
 - This allows stakeholders the ability to plan accordingly and better participate with specific data, research and informed analysis.
 - The comment period for the draft RFP is much too short -- and an example of creating an environment that limits thoughtful public input.

- The draft RFP indicates “AGENCY currently anticipates that AGENCY staff will facilitate engagement with utility representatives, industry stakeholders, and public interest groups, and the contractor will support engagement with members of the public and community-based organizations, among others.”
 - We have seen this same arrangement result in biased and incomplete findings in other states.
 - There must be an opportunity for stakeholders and subject-matter experts to engage directly with the vendor, even if it is supervised by the UTC staff.

As always, I very much appreciate the opportunity to make comments to the Commission and look forward to working with the Commission and other stakeholders to do our part to serve all Washingtonians.

Sincerely,

A handwritten signature in blue ink that reads "Dan S. Kirschner". The signature is fluid and cursive, with a long horizontal stroke at the end.

DAN S. KIRSCHNER
Executive Director