



**King County**

April 22, 2021

Washington Utilities and Transportation Commission  
621 Woodland Square Loop  
Lacey, WA 98503

RE: Docket UE-200980

Received  
Records Management  
04/22/21 15:51  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Dear Chair Danner and Commissioners Rendahl and Balasbas,

I am writing to comment on the joint settlement for Docket UE – 200980 that is relevant to Green Direct. King County is the largest subscriber of Green Direct, having enrolled nearly all of our facilities in Puget Sound Energy service territory into the program. I am writing to oppose the portion of the settlement that is relevant to Green Direct, and ask that the Commissioners give Green Direct customers an opportunity to better understand the rationale and mechanics of the proposed change in calculation methodology, and to provide informed feedback.

The proposed change in the calculation methodology for the Energy Charge Credit in the Green Direct program will have a deleterious effect to the financial performance of Green Direct for King County. We had projected very modest financial benefits from Green Direct, but now anticipate significant additional costs for electricity that we had not budgeted for. This will take funding away from other County services, which are in strong demand as we continue to address COVID and concomitant economic impacts.

We anticipated some level of rate adjustment from the fluctuation in power prices and were comfortable with that risk, but did not anticipate that the calculation method itself would be changed. We understand from Jon Piliaris' testimony in support of the multi-party settlement that parties reserve the right to reevaluate the rate in future proceedings. PSE staff tell me that they are interested in convening a stakeholder meeting this summer to discuss Green Direct, but should this settlement be approved, the change in calculation methodology and precedent for change without customer input will have already been made.

I have deep respect for the staff at the UTC with whom I have worked with on many complicated and highly technical issues. I am astonished that staff could have made such an error 5 years ago when the program was first developed that now, only six months into operation, has been discovered. This erodes the credibility of the UTC. I would like a clearer explanation of the changes, the rationale behind it, and how the parties agreed to it. While we are happy to pay the costs for green energy, we want to ensure that we are not disproportionately bearing the costs to transition to clean energy.

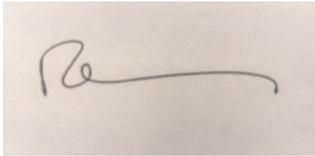
I understand that the proceedings and intervenors must proceed with confidentiality. However, as the largest subscriber to Green Direct, is very frustrated that this settlement was made without the participation of any Green Direct customers. At King County, we do not have the staff capacity to follow every rate proceeding much less intervene, although we may want to now.

As a customer, timely notice from either the UTC or PSE would have been appreciated. We were first made aware of the negotiations on March 22, only eleven days prior the settlement date, when PSE staff reached out. Many other subscribers were not aware of the changes until we informed them.

I urge the Commissioners to reject the settlement and give Green Direct customers and their technical staff or consultants an opportunity to better understand the changes and provide input.

Thank you again for the opportunity to comment.

Sincerely,

A rectangular image showing a handwritten signature in black ink on a light-colored background. The signature appears to be 'Rachel Brombaugh' written in a cursive style.

Rachel Brombaugh  
Director of Climate and Energy Initiatives, King County

[Rachel.Brombaugh@kingcounty.gov](mailto:Rachel.Brombaugh@kingcounty.gov)

(206) 263 - 9633