

Comments by James Adcock on Docket U-210595

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Comments on Policy Statement on Participatory Funding for Regulatory Proceedings U-210595

11/29/2021

Comments by James Adcock, Electrical Engineer, MIT, decades-long participant in public Integrated Resource Planning processes. James has spent his entire career engaging in statistical analysis, including at three Fortune 500 companies.

I write these comments while being (even yet) somewhat surprised by UTC's "Policy Statement on Participatory Funding for Regulatory Proceedings U-210595" [Statement date 11/19/2021, Delivery date to this commenter 11/29/2021]

Quote: "including *but not limited to* organizations representing low-income, commercial, and industrial customers, vulnerable populations, or highly impacted communities."

One could think (hypothetically) of this funding as substituting in part for the need for "Citizen Utility Boards" -- such as "Oregon CUB" -- I'm sure Commissioners are familiar with the history of CUBs and why Washington State has none. It is generally taken that CUB funding needs to be at least one million dollars a year to be viable. Consider, for comparison, if ratepayers were to support a CUB at a mere \$10 per year "subscription level." This, for the ratepayers of PSE, for example, would amount to about \$10,000,000 per year to the CUB. In comparison UTC limits total payments from PSE to *all* intervenor organizations to only \$300,000 -- more than a factor of 30X smaller. The resulting outcome is obvious: In practice intervenor organization will continue to be "starved" while utilities can easily afford to spend to "out-lawyer" intervenors by more than 10-to-1 -- easily quashing any real intervention efforts. I am reminded of a UTC meeting some years ago (I don't remember the exact subject) where I was the *only* person there representing the "ratepayer side of the table" -- sad as that "representation" might be. And so I chose to "sit at the table" for lack of better representation -- and then Commissioners and the (literally) 100 utility lawyers there were visibly annoyed that I had the "unmitigated gall" to even "sit at the table!"

In comparison, for example, PSE looks to be "on track" to spend more than \$600,000,000 per year by 2030 on "CETA Requirements" -- about half of which it appears they plan to waste on highly cost-ineffective methods.

The Northwest Energy Coalition [revenue about \$1M per year -- used to serve multiple states], I believe, could be one such example organization for funding which serves "broad customer interests" -- in working towards having rational regulations that address the complete costs of utility actions, including environmental damages. A recent KING-5 News poll found 77% of Washington adults are extremely concerned or somewhat concerned about climate change, demonstrating that most Washington State ratepayers *are* well represented by an organization that believes in climate change, and which believes we actually need to do something about it.

Certainly then, at least, the fact that an organization believes in climate change and that something should actually be done about it should not be held prejudicial to an organization receiving funding. Such prejudices are at least 20 years out of date!

There is no point in this funding if utilities -- and the UTC -- are allowed to restrict funding to only organizations who merely have "soft gums" and not "sharp biting teeth." Those organizations that utilities -- and the UTC -- might least want to support may prove to be the best organizations to actually represent ratepayer interests!

There is also a clear need for intervenor funding on the level what will truly allow the fair, independent and unbiased duplication of utility modeling efforts, including having complete access to the non-public "inputs" to the modeling process that have been submitted to UTC, but which utilities refuse to make public. The first step to this process would be for the intervenor to see if they can simply duplicate the utility's modeling efforts. If this is not possible, it is because the utility failed to submit the entirety of the modeling inputs to the UTC -- or that the utility falsified those submissions to the UTC. The second step is for the intervenor to then take a "jaundiced eye" towards those modeling efforts in order to try to discover (or confirm suspicions of) utility bias in their modeling efforts, etc. Since UTC has decided to avoid taking on this task, some other independent organization needs to do so -- otherwise utilities can accomplish any utility goal simply by "faking" their modeling analysis. And I certainly don't believe such an independent modeling effort can be produced even for \$300,000 per utility. The end result is that UTC simply will continue to blindly accept utility modeling efforts no matter how extremely skewed such modeling efforts are towards producing the end results that the utility wanted "prove" in the first place. And then ratepayers will continue to be ripped off by utility "service" which is both needlessly too expensive, and needlessly too much carbon pollution -- and which doesn't, in fact, even "keep the lights on." That is the nature of "environmental economic hostage taking."

Thank you for your consideration,

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