



February 28, 2020

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodlawn Square Loop SE
Lacey, WA

RE: Docket UE-191023

Dear Mr. Johnson,

Spark Northwest is a nonprofit organization founded in 2001 to speed the equitable transition to clean energy in the Pacific Northwest. We have a track record of partnering with people to realize their goals, from beginning clean energy thinking to putting complex plans into action. Our experience shows that solutions that incorporate community-level participation and equitable ownership can reduce energy burdens and build wealth for those communities.

As a general matter, we encourage the Commission to develop concrete guidance and standards for utilities to incorporate equity into meeting CETA requirements. The addition of equity goals is new territory and developing clear benchmarks and measurements will be important to set the stage for this new type of compliance analysis. We also encourage active solicitation of input from the communities that these equity goals are designed to address. People who are impacted by racism and poverty have valuable information about what will be effective to close the health and wealth gaps that persist.

To that end, we promote and second the comments submitted by Front & Centered to this rulemaking process. Spark Northwest reviewed a draft of those comments and found them to align with what we hear directly from the frontline communities that we work with to plan clean energy projects. We also strongly support comments from the Energy Project, which has hands-on experience working with people with limited financial resources across the state.

In addition to those general affirmations, we have a few additional comments on one of the questions posed:

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Question 7 - What guidance (content and form) should the Commission provide to ensure utilities employ robust, equitable, and inclusive public involvement in drafting CEIPs?

1. **Lower barriers for participation in by varying the times, methods, incentives and languages used to collect input.** For example, participating during the day may mean foregoing wages during the time spent away from a minimum wage or piece-rate job. Transportation is often burdensome in terms of time and money, especially in rural areas. People may have less ready access to online information. They may have less trust of institutions. And many speak a language other than English. In some parts of the state there are just few languages primarily spoken, while in other parts there are dozens.
2. **Require that utilities invest in targeted communication.** One tool that utilities have at their disposal that is not always the case for entities seeking feedback from frontline communities, is regular communication with customer via their monthly bills. This could be a good way to provide information, especially if offered in multiple languages. Also, given the many strains on resources for people with low-incomes, an effective strategy to encourage participation would be to offer a stipend or bill credit for taking time to complete a survey or attend a focus group meeting.
3. **Finally, when assessing whether outreach efforts and programs are successfully engaging with the intended community, it is important to use metrics that match the goal.** For example, when assessing if participation rates match the local population's demographics, the appropriate comparison should be to those living with lower incomes rather than the county or district as a whole.

Thank you for your consideration of these comments. We look forward to continued dialogue as implementation of the Clean Energy Transformation Act creates a healthier, more fair state for all people living in Washington.

Sincerely,



Andrea Axel
Executive Director

