

SENT VIA WEB PORTAL

February 28, 2020

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
P. O. Box 47250
Olympia, Washington 98504-7250

Received
Records Management
03/02/20 07:46
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act, Docket UE-191023, Comments by Washington Environmental Council

Dear Mr. Johnson:

Thank you for the opportunity to comment on Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act. This letter constitutes our response to the notice of opportunity to file written comments in Docket UE-191023.

Washington Environmental Council is a statewide not-for-profit environmental advocacy organization that works to protect and restore the environment for all Washingtonians. We work in collaboration and coordination with other environmental organizations, environmental justice organizations, tribal nations, labor unions, businesses and more, to effect change.

CEIP targets

- Utilities should identify specific targets for energy efficiency, demand response and renewable energy annually within the four year compliance period, as well as expressing those annual gains as cumulative targets. This will make tracking progress towards achieving CETA's standards direct and clear, and accessible to stakeholders.
- From 2022 to 2030 and from 2030 to 2045, utilities should identify interim targets annually within the four year compliance period, as well as express those annual gains as cumulative targets. Utilities should express interim targets in the same terms as the standards under Sections 4(1) and 5(1): the amount of nonemitting electric generation and electricity from renewable sources as a percent of the utility's retail electric loads over the period. This will make tracking progress towards achieving CETA's standards direct and clear, and accessible to stakeholders.
- Both specific targets for energy efficiency, demand response and renewable energy as well as interim targets should specifically address how actions to meet those targets will equitably distribute costs and benefits and reduce burdens and risk for vulnerable populations and highly-impacted communities.
- The Commission should require more stringent targets if a utility's specific or interim targets do not demonstrate meaningful progress toward meeting the standards under Sections 4(1) and 5(1).

Public process

- Public engagement and public involvement should include advisory groups, workshops, comment periods and hearings, from drafting and development through the Commission's decision on a CEIP.

Demonstration of compliance with RCW 19.405.030, 040, and 050

- Utilities must demonstrate elimination of coal-fired resources from their allocation of electricity after 2025. In this context, "allocation" means the action or process of distributing electricity. Demonstration of compliance should be done on an annual basis as an attestation. Commission rules should include how utilities can rely on and document the attestations of other parties, as when demonstrating for a long-term (more than one month) contract for electricity purchase, no electricity from a coal-fired resource was included in that purchase.

Equitable distribution of benefits

- The Commission should begin by providing a policy statement on Section 4(8) compliance. As metrics to measure the equitable distribution of benefits are developed in a participatory manner, the Commission should develop a rule.
- A utility's demonstration of compliance with Section 4(8) should include quantitative data. As methodologies develop, qualitative data should be supplanted by quantitative approaches that reflect actual populations and conditions.
- We appreciate the ongoing efforts among stakeholders, the Commission and the Department of Commerce to develop metrics to evaluate compliance with Section 4(8). Costs and benefits related to energy sources, electricity delivery, siting and facilities, maintenance and decommissioning, purchasing, hiring, contracting, rate-setting, assistance, customer participation, and customer ownership are all important to consider.

Incremental cost of compliance

- The Commission should determine whether the incremental cost of compliance threshold has been met based on actual data at the end of the compliance period.
- The Commission should clarify in rules what costs are directly attributable to meeting the standards in Sections 4 and 5, and, in particular, that the requirements of Section 12 and actions included in Business as Usual scenarios in IRPS and CEAPs are not directly attributable to actions necessary to comply with Sections 4 and 5.
- Section 6(3)(b) should be interpreted to prohibit any use of alternative compliance options if the utility has not acquired renewable or nonemitting resources for at least 80% of retail electric sales in Washington.

Thank you for the opportunity to comment on these important topics.

Sincerely,

Eleanor Bastian
Climate and Clean Energy Policy Manager