



September 21, 2021

Amanda Maxwell
 Executive Director
 Washington Utilities & Transportation Commission
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Re: Notice of Opportunity to File Written Comments on Draft RFP, U-210553

Dear Ms. Maxwell:

Thank you for the opportunity to provide written comments on the draft RFP, released by the Utilities and Transportation Commission (“UTC”) on September 13, 2021. Requesting public comment at this stage of the consultant selection process is the most expedient way to gather stakeholder input and ensure transparency, while also encouraging a strong pool of candidates to apply.

Overall, the undersigned organizations think the draft RFP should result in a good selection of consultants submitting proposals, and believe that the language is consistent with the budget proviso language specified in SB 5092. Regarding the draft RFP, we have two suggestions:

1. As the Commission looks at the different pathways for meeting our decarbonization mandates and transitioning to a clean built environment, equity and access to the benefits of decarbonization should be a primary principle, and we appreciate that creating an equitable public process is central to this draft RFP. An equitable public process will be essential to ensuring that issues related to affordability and consumer choices are informed by input from customers. The Commission should consider authorizing intervenor funding for this docket to help bring more voices to the table.
2. Currently for scoring, the draft RFP has a 30% weighting for technical expertise and a 60% weighting for management expertise. While both aspects are very important to the investigation, we would suggest increasing the weight of the technical component slightly (e.g., to 40%).

Broadly speaking, it is essential that the outcome of this process yields a strong, impartial analysis and policy recommendations for both Legislative and regulatory implementation. To succeed at this, the consultants hired by the Commission to carry out this work must meet the highest standards of neutrality and analytical rigor, with a strong understanding of carbon emission reduction strategies and challenges, along with thorough knowledge of the utility sector. Consultants specifically predisposed to the gas industry, for example, should not be considered.

Separate from the draft RFP, but essential to the work of this proceeding:

- As soon as is practical, we ask the Commission to release a work plan with anticipated timeframes for public engagement.
- We also recommend that the Commission hold a general workshop in the near-term. This workshop could hear about lessons learned from other states that have or have had “Future of Gas” dockets and investigations – for example, Massachusetts and California. A significant amount of work has been done in other states to answer similar questions posed in the examination, and the Commission and likely its consultant can benefit from that expertise.
- It would also be useful for the UTC to provide financial and statistical information on the gas utility industry in Washington; for example, the Oregon Public Utilities Commission, as part of its Natural Gas Fact-Finding docket (UM 2178), provided an “industry snapshot” of finances and operations for the gas utilities within the state.¹ Since the UTC has discontinued its practice of publishing annual statistics for each of the energy companies, providing this foundational information at the start of a stakeholder process will be important in order to support informed participation.

We look forward to a consultant coming on board swiftly to provide expertise and advice to the Commission on these important topics. We appreciate the Commission has given this opportunity to weigh in on the RFP.

Thank you for considering our comments,

Amy Wheelless
Senior Policy Associate
NW Energy Coalition

Kelly Hall
Senior Policy Manager
Climate Solutions

Jessica Yarnall Loarie
Senior Attorney
Sierra Club

Alejandra Mejia Cunningham
Building Decarbonization Advocate
NRDC

¹ <https://www.oregon.gov/puc/utilities/Documents/EO20-04-NGFF-Plan-WS1-Presentation.pdf> (beginning slide 50)