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State Of WASH.
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COMMISSION

From: [Beth Nelson](#)
To: [Records Management \(UTC\)](#)
Subject: Comment for Docket U-210590
Date: Tuesday, May 3, 2022 5:02:11 PM

External Email

Commenting party's name: Elizabeth Nelson

Comment date: May 3, 2022

Comment title: Please support outcomes-based metrics that acknowledge the value of energy efficiency to the grid

Dear Ms. Maxwell,

First, as a utility customer in Washington State, please let me say I appreciate the opportunity to comment on this workshop. This comment is in response to question 3a of the notice dated May 2, 2022.

I believe utility rates should be based on outcomes, and I observe that the outcomes an energy utility customer values are only indirectly related to kWh of electricity or BTUs of gas the customer consumes. Rather, the value a customer receives from an energy utility is better described by the standard of living the utility delivers to a building's occupant. For example, an energy utility provides value to occupants of a building by ensuring that no matter how dark it is outside, the occupant always has enough light inside the building to work productively or pursue their preferred form of leisure. An energy utility also provides value to a building's occupant by ensuring that no matter how hot or cold it is outside, the inside of the building is a comfortable temperature.

From an engineering perspective, a utility has more than one option for how to deliver this value. It can provide the service solely through providing electricity or gas, sure. But it can also provide this value through a combination of electricity/gas sales and building retrofits. For example, indoor lighting could come from a combination of energy delivered to lightbulbs *and* new light wells. Comfortable indoor temperatures could come from a combination of energy delivered to heat pumps/furnaces *and* new building insulation.

My opinion is that rates should compensate energy utilities equally regardless of whether the utility delivers value to the customer through delivering energy or retrofitting the building. In other words, revenue should be equal regardless of whether the utility sells megawatts or "negawatts."

Washington's investor-owned utilities are in a unique position to fund green retrofits through power purchase agreements, and our state's regulations should give them clear opportunity to do so (as Seattle City Light currently does through its Energy Efficiency as a Service program).

Thank you for the opportunity to comment.

- Elizabeth Nelson

