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Via UTC Web Portal

Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Sq. Loop SE
P.O. Box 47250
Lacey, Washington 98503

Re: The Energy Project's Comments on a Joint Low-Income Advisory Group; Docket U-230161

Dear Kathy Hunter:

The Energy Project (TEP) respectfully submits these comments in response to the questions in the Commission's August 30, 2023 Notice of Workshop and Opportunity to Provide Comments. TEP appreciates the Commission's commitment to working with interested persons to arrive at a holistic understanding of impacts of the Climate Commitment Act (CCA). TEP supports the Commission's proposal to create a Joint Low-Income Advisory Group (Joint Advisory Group), suggests that the Commission appoint a neutral party to facilitate the advisory group, and suggests that the Commission set guidance and deadlines for its final output. TEP also supports the consideration of a risk-sharing mechanism for CCA costs and proceeds, such as the one proposed by the NW Energy Coalition.¹

TEP supports the creation of the Joint Advisory Group. There are significant outstanding issues relating to the treatment of low-income customers under the CCA. The Joint Advisory Group presents an opportunity for utilities, Commission Staff, and interested parties to discuss these important issues in an efficient, holistic manner. Convening a Joint Advisory Group will likely save the Commission and interested

¹ Dkt. U-230161, Facilitation of a Commission-led workshop series on the Climate Commitment Act, Northwest Energy Coalition Cost Recovery Mechanism Concept (July 18, 2023).

persons resources compared to having the same discussion in each utility's low-income advisory group.

TEP suggests that the Commission appoint a neutral party to facilitate the Joint Advisory Group because it will include many people, and representatives of the five investor-owned utilities could outnumber other participants. For example, someone at the Commission or an independent third-party could facilitate the Joint Advisory Group.

The Commission should also provide guidance about the Joint Advisory Group's scope. For example, TEP has consistently voiced concern that if utilities only provide credits to known low-income customers, they will fall far short of complying with their statutory obligation to provide credits sufficient to offset all CCA-related costs to low-income customers.² The Commission should task the Joint Advisory Group with considering methods for expanding the number of low-income customers who receive CCA bill credits beyond currently-known low-income customers, similar to the Commission's decision concerning Puget Sound Energy's identification of low-income customers.³

Utilities are likely to seek recovery of CCA costs in the near-term. Therefore, it is vital that the utilities develop methods for expanding the scope of low-income customers who receive bill credits before CCA costs are recovered in rates, and that the Commission set a deadline for the Joint Advisory Group's work.

TEP thanks the Commission for the opportunity to provide these comments.

Very truly yours,

/s/ Yochanan Zakai

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² See RCW §§ 70A.65.120(4); 70A.65.130(2)(a).

³ Dkt. UG-230470, Puget Sound Energy's Climate Commitment Act Tariff Revision, Order 01 (August 3, 2023); Dkt. UG-230471, Puget Sound Energy Petition for an order authorizing accounting treatment, Order 01 (August 10, 2023).