



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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September 23, 2022

NOTICE OF OPPORTUNITY TO COMMENT
(Comments due by 5 p.m. on October 10, 2022)

RE: Developing a Commission jurisdictional specific cost-effectiveness test for distributed energy resources incorporating CETA, Docket UE-210804

TO ALL INTERESTED PERSONS:

On November 8, 2021, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments in Docket UE-210804 soliciting feedback from interested persons on Commission staff's (Staff) investigation to determine whether additional guidance related to the cost-effectiveness of distributed energy resources (DERs) is necessary. Staff intends to develop a jurisdiction-specific test for DERs that incorporates the goals of the Clean Energy Transformation Act. Staff's investigation will follow the process and principles described in the [National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources](#). The Commission has held three virtual workshops, on May 10, August 1, and September 20, 2022, addressing stakeholder feedback and discussing applicable policy goals, current practice, utility system impacts, and non-utility system impacts.

As a follow-up to the September workshop, the Commission requests that interested persons file written comments by October 10, 2022. Staff will use the information provided to develop a straw proposal of a jurisdictional specific test for discussion at the next workshop.

Attached to this notice is a template titled "Utility Detail Template" to further describe current utility practices around how impacts are valued for DERs. This template also surveys for areas where there may be a lack of data or materiality and begins exploring possible alternative methods of inclusion. Staff requests that each electric and gas utility fill out this template in its entirety.

All interested persons should address the impacts in the table below and indicate if each is applicable for the following DERs:

- a) Energy Efficiency

- b) Demand Response
- c) Distributed Generation
- d) Distributed Storage
- e) Electric Vehicle Supply Equipment

Please add any impacts that may be missing from this list.

Societal Impacts	Greenhouse Gas Emissions
	Other Environmental Impacts
	Public Health
	Economic Development and Jobs
	Resilience
	Energy Security
Host Customer Impacts	Measure Costs (Host)
	Transaction costs (Host)
	Interconnection Fees
	Risk
	Reliability
	Resilience
	Other Fuel
	Tax Incentives
	Non-Energy Impacts (non-low income)
	Asset value
	Productivity
	Economic well-being
	Comfort
	Health & safety
	Empowerment & control
	Satisfaction & pride
	Non-Energy Impacts (Low income)

WRITTEN COMMENTS

The Commission provides notice that interested persons may file comments in this Docket by 5 p.m. on Monday, October 10, 2022.

Pursuant to WAC 480-07-250(3), written comments must be submitted via the Commission’s web portal at www.utc.wa.gov/e-filing. If you are unable to submit documents via the portal, you may submit your comments by email to the Commission’s Records Center at

records@utc.wa.gov or on a disc or other commonly used electronic storage medium by mail or hand delivery as provided in WAC 480-07-140 (5)(c), without providing a paper copy. Comment submissions should include:

- The Docket number of this proceeding (Docket UE-210804).
- The commenting party's name.
- The title and date of the comment or comments.

The Commission will post on its website all comments that are provided in electronic format. The website is located at <https://www.utc.wa.gov/casedocket/2021/210804>.

If you need translated materials, please contact records@utc.wa.gov or call (360) 664-1234.

If you have questions regarding this workshop, you may contact Jennifer Snyder at jennifer.snyder@utc.wa.gov or (360) 664-1311.

AMANDA MAXWELL
Executive Director and Secretary