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**U-240281**

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***Via Electronic Filing***

Jeff Killip  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: **Docket U-240281 - Rulemaking required to implement ESHB 1589**

Dear Executive Director Killip:

The Alliance of Western Energy Consumers (“AWEC”) hereby submits this letter in response to the Commission’s September 27th Notice of Opportunity to File Written Comments in Docket U-240281 by October 4th for an October 11th workshop. While AWEC understands that the Commission must adopt rules by July 1, 2025, to implement aspects of ESHB 1589, AWEC is disappointed in the extremely short notice to draft and file written comments in order to be considered for the October 11th workshop. As the Commission is aware, there was a hearing on September 30th and October 1st for Avista’s currently pending general rate case proceeding. Prior to the hearing, AWEC’s representatives were fully occupied in preparation for the hearing. Two business days to draft and file comments answering the six questions posed, not including sub-parts, on significant policy issues such as the cost test, which resources qualify as emissions reduction measures, and avoided costs, is not workable. Although we understand that the Commission “anticipates several future opportunities to file written comments regarding the development of the cost test,” not having an opportunity to fully address the Commission’s questions ahead of the first technical workshop puts stakeholders at a disadvantage. AWEC is working to supplement these initial remarks with substantive discussion of the Commission’s questions as soon as practicable. We ask that the Commission consider feedback on the questions in the September 27th notice submitted after the October 4th deadline.

Sincerely,

/s/ Sommer J. Moser

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*Of Attorneys for the Alliance of Western Energy Consumers*