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**From:** [rsb2](#)  
**To:** [Records Management \(UTC\)](#)  
**Subject:** Comments on Docket U-210553  
**Date:** Monday, August 9, 2021 2:04:15 PM

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### External Email

Reference: Docket U-210553  
Subject: Suggestions on Commission's examination of decarbonization impacts and pathways for electric and gas utilities to meet state emissions targets  
From: Robert Briggs, Vashon Climate Action Group  
Date: Monday, August 9, 2021

*[This message repeats comments I submitted in the chat during the August 9 workshop, but now includes references.]*

Important context for this discussion was just provided by UN Secretary General António Guterres, who called our current situation with respect to climate "code red for humanity."

I have two suggestions for this work:

1) Please consider the option of state regulation that would require all air-conditioning systems sold in the state to include reversing valves necessary to also provide space heating. There have been studies that have shown that the incremental cost of including this capability in air-conditioning systems is quite small. This requirement will expand consumer choice by enabling gas users to heat their homes with the most appropriate or least costly fuel, while avoiding disruption and large expenses as the inevitable contraction of the gas system takes place as decarbonization proceeds.

Reference: Nate Adams on 'The Energy Gang' podcast entitled "Unlocking Home Electrification with Heat Pumps" released on April 15, 2021 [<https://podcasts.apple.com/us/podcast/unlocking-home-electrification-with-heat-pumps/id663379413?i=1000517299281>] provides cogent arguments for why simply preventing the sale of air-conditioners without the missing reversing valves to provide heating provides consumer protection and is an extremely cost-effective way to facilitate the transition away from reliance on fossil gas. Discussion of the policy proposal begins at 30:43 of the podcast.

2) The gas distribution system leaks. Recent studies have found higher than expected leakage rates, for example, from gas meters among other components. That means that we will not get proportionate emissions reductions by simply reducing gas consumption; we will need to contract the gas system to efficiently realize rapid emissions reductions.

Residential space and water heating will not be the highest and best use for renewable natural gas and renewable electrofuels, which will be in short supply for the foreseeable future, as there are

good electrical alternatives for the residential sector. Therefore, we need the Commission and Legislature to fashion incentives to enable utilities to plan for a strategic contraction of their gas distribution systems, particularly those serving residential customers, so that we can ensure continued delivery of essential services to current gas users, while ensuring that the interests of low-income families are protected through the transition away from fossil gas.

Mason Inman and Emily Grubert, “The Gas Index Report 2020: The United States’ Natural Gas System has a serious problem—it leaks,” December 15, 2020. <https://thegasindex.org/>. An excellent interview with the authors highlighting the point above can be found here: The Energy Transition Show, Episode #140 – Methane Leakage, Feb. 20, 2021. <https://xenetwork.org/ets/episodes/episode-140-methane-leakage/>