



NW Energy Coalition
for a clean and affordable energy future

October 10, 2022

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
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Re: Docket UE-210804, Comments on Behalf of the NW Energy Coalition

Ms. Maxwell:

We appreciate the opportunity to provide comments that will further the ongoing development of a jurisdiction-specific cost-effectiveness test for DERs. The NW Energy Coalition (NWECC) is a public interest organization that works across the Pacific Northwest and is focused on ensuring clean, affordable, and accessible energy for all customers. Our staff and members have participated in this docket since its creation in November 2021, and we look forward to continuing our involvement.

First, we want to offer general comments on the set of DERs being discussed.

During the September 20, 2022 workshop, a few stakeholders questioned the inclusion of EVSE as a DER in the table of impacts being reviewed. To that point, we recognize the capability EVSE has to act as a mechanism of both demand response and distributed storage, but we believe that EVSE should continue to be discussed as its own DER. However, it is unclear what the barriers to utility investments in EVSE are and how the application of a jurisdiction-specific cost-effectiveness test will address those barriers. While we agree with the inclusion of EVSE as a DER, we urge the UTC to assess the policy outcomes related to EVSE that they are trying to achieve before adopting additional cost-effectiveness requirements for EVSE.

A jurisdiction-specific cost-effectiveness test could, however, help determine the value of fuel switching and building electrification. This round of comments did not specifically call out building electrification as a DER, though previous comment periods did. Providing guidance for how to best value building electrification could better incentivize programs that promote fuel switching (i.e., from both gas to electric and delivered fuels to electric). Electrification is listed

and described as a DER in Chapter 10 of the National Standard Practice Manual and we think it should be discussed as part of Washington's conversation.

Additionally, at the September 20, 2022 workshop, stakeholders were asked to "indicate if the impact be quantified, addressed qualitatively, or be included as a proxy in the first use of the test" in this round of comments. While this request was not included in the Notice of Opportunity to Comment, we want to flag a resource that could help begin the virtual conversation. A 2020 study from Lawrence Berkeley National Laboratory (Sutter et al., 2020) "reviewed studies quantifying non-energy impacts used in 30 states and applied a five-point system to indicate transferability of a value or method from each study for 16 categories of non-energy impacts"¹, including many of the specific utility and non-utility impacts being discussed in this docket. This study, and the many it references, could be helpful in future discussions we have on whether and how to quantify impacts.

Finally, please find attached the table of societal and host customer impacts that stakeholders were asked to complete. It is completed to the best of our knowledge and we wanted to acknowledge that:

- A few cells are marked "unsure" as to note that while we are unsure of a relationship between the specific impact and listed DER, we do not want to eliminate the possibility that it exists.
- It is unclear whether we were to list separate impacts underneath "Non-Energy Impacts (Low income)" or indicate in this row which DERs apply to low-income NEIs overall. We have done the latter and can offer additional input if our interpretation here is incorrect.

Thank you for the opportunity to comment.

/s/

Charlee Thompson
Policy Associate
NW Energy Coalition

¹ Mary Sutter et al. *Applying Non-Energy Impacts from Other Jurisdictions in Cost-Benefit Analyses of Energy Efficiency Programs: Resources for States for Utility-Customer Funded Programs*. Lawrence Berkeley National Laboratory. (2020). <https://emp.lbl.gov/publications/applying-non-energy-impacts-other>