

*Comment on UE-Filing UE-190698 related to amending the integrated resource planning (IRP) process to align with CETA requirements.*

My name is Elyette Weinstein. I am filing this comment on behalf of the Vashon Climate Action Group. We support adding a requirement in WAC 480-100 that the Public Counsel Division (PCD) of the Washington State Attorney General be explicitly authorized to provide oversight of the contractor bidding process for conservation potential assessments.

WAC 480-100-238 defines an "integrated resource plan" (IRP) as "...a plan describing the mix of energy supply resources and conservation that will meet current and future needs at the lowest reasonable cost to the utility and its ratepayers."

The Public Utility Commission (Commission) proposed WAC 480-100-600 defines the IRP as an analysis that describes the "mix" of "...conservation and efficiency..." followed by other criteria. See also: proposed WAC 480-100-610(2)(a).

These proposed WAC's as well as RCW 19.285.040 acknowledge that the assessment of conservation potential is key to the IRP process. The critical importance of the conservation potential assessment (CPA) to the IRP process calls for public transparency and oversight.

Currently, the CPA process does not require such transparency or oversight. The entire CPA contractor bidding process, most importantly data requirements and methodology, are hidden from public view, including that of the PCD. Consequently, during this formative stage of the CPA, the PCD cannot effectively use its expertise to provide input or otherwise exercise its duty to represent the public interest.

PCD oversight at the contractor bidding stage of the CPA will bring the process sorely needed public participation and transparency, furthering the IRP transparency and public participation goals of the Commission's proposed WAC 480-100-610(10).

This process improvement need not compromise the protection of commercial information produced by the utility or the CPA contract bidder. Current non-disclosure agreement procedures are not at issue. However, if need be, the PCD can also sign a non-disclosure agreement to assuage utility or contractor concerns. Such confidentiality agreements are often signed by public agency attorneys.

Finally, Public Counsel Division oversight of the CPA contractor bidding process can only serve to reduce public frustration during the subsequent IRP process, saving the Commission and the public time and effort.

Based on the forgoing, the Vashon Climate Action Group requests that the Commission conserve its resources, increase public participation and transparency by adding a provision to proposed WAC 480-600 *et seq.* requiring the PCD to provide oversight of the contractor bidding process for conservation potential assessments.

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