

April 9, 2018

Mr. Glenn Blackmon
Senior Energy Policy Specialist
Washington Department of Commerce
1011 Plum St SE
Olympia, WA 98504

**RE: Washington Department of Commerce Proposed Rulemaking (CR-102) on
WAC 194-37-140(2): Documentation of renewable resource financial path for no-
load growth utilities**

Dear Mr. Blackmon,

Renewable Northwest and NW Energy Coalition appreciate the Department of Commerce's ("Commerce") suggested changes to the calculation method in WAC 194-37-140(2) for determining whether a utility, for the purposes of Energy Independence Act ("EIA") compliance, is eligible to use the no-growth cost cap method. The undersigned groups support the revisions reflected in the draft rule, which better reflect the intent of the EIA and offer greater certainty to utilities and regulatory bodies.

The draft rule adequately reflects the statutory language and improves upon the existing rule by better articulating a methodology. The additional specificity importantly offers both clarity and consistency.

Renewable Northwest and NW Energy Coalition thank Commerce for its efforts to better align WAC 194-37-140(2) with the general purpose of the EIA.

Sincerely,

Amanda Jahshan
WA Policy Advocate
Renewable Northwest

Joni Bosh
Senior Policy Associate
NW Energy Coalition