

Commenter	Suggested Change	Agency Response
<p>NW Energy Coalition, The Energy Project, Spark Northwest</p>	<p>“Energy assistance need” means the amount of assistance necessary to achieve an energy burden equal to <u>not to exceed</u> six percent for utility customers.”</p>	<p>Not accepted. The statutory use of the “energy assistance need” definition is as an input to determine a statewide level of need for Commerce as they collect aggregated state data under RCW 19.405.120(3)(a) and for the utility assessment due under RCW 19.405.120(4). Therefore, the input of energy burden should be a discrete number that can be used to define comparable need across the state. This is not a programmatic threshold and therefore should not limit any utility from designing a program that uses a lower energy burden value to define eligible participants.</p>
<p>The Energy Project</p>	<p>Recommends that this language from the notice be incorporated in rule adoption documents for this CR 102 and in any formal guidance documents issued by the agency regarding CETA low-income requirements, including the Commerce “Guidelines for RCW 19.405.120” (Version 03.09.2020): “[t]hese definitions do not limit any utility from designing a program that uses values below the defined threshold for energy assistance need and low-income to define eligible participants.”</p>	<p>Thank you for the comment.</p>