

NW Energy Coalition

Mitigation plan goals and overarching principles

Mitigation Plan Goals and Principles

The Coalition supports the Draft Plan's stated goals and resulting scope, which results from the specific nature of VW's injury to the citizens of Washington. The goals are satisfactory as is and create clear intent for project evaluation and execution. The identified principles provide necessary context and direction for the goals, but the types of projects later highlighted in the Draft Plan demonstrate the consideration of another principle: leverage co-benefits beyond air quality for all Washingtonians. For example, by investing in electric road or off-road vehicles, utilities' existing generating resources can better utilized which can deliver cheaper electric rates to all customers. Another example is that organizations can use funds to introduce pilots on existing technologies, like electric port equipment, allowing use cases to be explored for similar organizations in Washington. We recommend adding this principle to the others provided in the draft plan.

By making these additional co-benefits a priority, the Department can make every dollar from the Mitigation Funds allocated to Washington go much further in not only achieving the stated goals, but accelerating state-wide transformations in behaviors and operations that result in economic, environmental, health and societal benefits for all Washingtonians.

Priorities

Mitigation Plan Priorities

The Coalition supports the inclusion of priorities considering the breadth of the Draft Plan's goals, the amount of money that will be available for projects, and the number of projects that Department will consider. Below is a list of the priorities found in the Draft Plan followed by comments and any questions for each priority.

1. "Accelerate adoption of electric vehicles, equipment and vessels"

The Coalition strongly supports this priority. Not only will electrification utilize Washington's clean, renewable grid, but any funding will arrive at a critical time in the transportation electrification market transformation process. Funding that supports vessel or port electrification will be at the forefront of Washington's off-road electrification efforts and could pave the way for information sharing, use-case validation and technology investigation that results in additional electrification in the state. This potential scenario ties back to the Coalition's suggested principle described earlier in these comments.

Caution is warranted when any organization considers investing in newer technologies such as electric vehicle supply equipment (EVSE) or electric motors for medium- or heavy-duty vehicles. The Coalition urges the Department to create criteria that reduces risk in pursuing electrification technologies, such as tested technologies, reputable manufacturers, and interoperability characteristics. Imprudent investments could result in stranded assets or the inability to access data that could be used in future programs. The Department could refer to the Washington Utilities and Transportation Commission's recent policy paper that provides guidance to investor-owned utilities regarding investments in EVSE. The Coalition recommends, at a minimum, soliciting input from the public to create such a standardized evaluation.

2. “Promote electrification technologies in public transportation fleets”

The Coalition strongly supports this priority. Washingtonians stand to benefit greatly by funding public transit due to agencies’ duty to serve all customers and the accountability that comes with government agencies. Furthermore, diesel-fueled buses can be some of the larger diesel emission generators in parts of communities. A significant advantage to providing funding to public transit agencies is their inherent transparency such that valuable data can be made available to the Department and other state organizations. By electrifying fleets and increasing fleet sizes, the Department could grant more people access to electric buses and the commensurate air-quality benefits than were the money to solely go to private vehicles.

Compared to private enterprises, which often have access to additional capital, public transit agencies likely have more limited financial resources. The Coalition encourages the Department to execute an outreach campaign in order to ensure that transit agencies that may not otherwise have the wherewithal to acquire electric fleets have the opportunity to receive funds. Geographic and socioeconomic diversity of fund disbursement is imperative; transit agencies serving rural communities are excellent candidates to ensure such goals are met.

3. “Accelerate fleet turnover to the cleanest engines”

The Coalition cautiously supports this priority, knowing that for some diesel-burning vehicles, electrified alternatives are either not available or are not practical. Though electrification is ideal, especially considering the average carbon content of Washington’s utilities’ fuel mixes, the opportunity to reduce emissions in the near-term stands to benefit Washingtonians, especially those in disproportionately impacted communities. The biggest concern the Coalition has regarding this priority is the risk from investing in cleaner, fossil-fuel based engines that may become obsolete in the near- to mid-term. The Coalition believes the best way to mitigate this risk is to review projects on a case-by-case basis in order to research the pertinent markets in order to ascertain the status of available technologies and the resulting risk. The emphasis in this type of project review should be a long-term cost/risk benefit analysis to ensure that funds are spent effectively to maximize emission reductions, health benefits and other objectives.

4. “Achieve substantial additional emission reductions – beyond what would already occur, absent trust funding”

The Coalition strongly supports this priority. Additionality should be the foundation for evaluation of any proposed project. As the Department indicates in using the term “accelerate” in the previous priorities, the funds should not go to projects or efforts that would be already be implemented due to market forces, legal requirements or standard business operations. Organizations, private or public, must clearly demonstrate in any project proposal that the funds’ purpose is to support additional diesel reductions above and beyond what the organization would otherwise be doing.

The Coalition is particularly concerned about private firms utilizing awarded Mitigation Funds in a way that may not directly fund approved projects, such as paying down debt or diverting monies to shareholders. With public organizations, like ports or transit agencies, the Department should ensure that awarded Mitigation Funds yield incremental expansion of projects rather than reducing the costs of existing projects. For example, requiring a transit agency to purchase six electric buses rather than five buses at a lesser cost. The Coalition believes this priority is a crucial element in ensuring that organizations that otherwise would not be able to reduce their respective diesel emissions, like rural transit agencies or non-profit organizations that provide transport services,

have an opportunity to benefit from the Mitigation Funds.

5. “Ensure cost-effectiveness”

The Coalition supports this priority, recognizing that in order to maximize the benefits that can be achieved with limited funds, the Department needs to fund projects that demonstrate net benefits. However, caution is warranted when determining which cost-effectiveness methodology to utilize in the project evaluation process. First, the Department should endeavor to select a methodology that is inclusive of as many quantifiable benefit streams as possible and incorporates a long-term view of cost-effectiveness. Expansive methodologies like ones modeled after a total resource cost test which could include important values such as the social cost of carbon and public health benefits would enhance the overall impact of the Mitigation Funds. By limiting benefits to conventional values or short-term outcomes, like reduced operating costs or capital costs, project diversity may likely be limited.

Second, the Coalition urges the Department of Ecology to apply this criterion flexibly rather than mandatorily. In certain circumstances, a project that may be on the cusp of cost-effectiveness but has unique non-quantifiable benefits, such as benefiting a disproportionately impacted community or demonstrating a new use case of a proven technology, could deliver greater benefits in the long-term if awarded funding. The Coalition anticipates the Department including a public component of the eventual evaluation process, which would enable a nuanced review that could utilize non-traditional criteria.

6. “Leverage additional matching funds”

The Coalition understands additional funds, when available, make individual projects more cost effective, reducing the cost per unit of diesel emissions eliminated. Depending on the cost-effectiveness methodology, matching funds may result in cost-ineffective projects to become net positive. Assuming that all project organizers had equal opportunity to matching funds, the Coalition would support this priority. However, this assumption fails to acknowledge the inequity that likely will characterize the potential pool of project candidates, some of whom will not have the opportunity to leverage such funds. For example, some non-profit organizations specializing in services to disadvantaged communities are already operating on limited budgets and reduced capacities. This priority would discriminate them when it’s quite possible these same organizations would benefit the most from the Mitigation Funds because they are serving communities disproportionately impacted by diesel emissions.

To avoid the potential deprivation of funds to groups that would be excluded by this priority, the Coalition requests the Department include protocol within its project evaluation process to ensure that projects that may not be able to leverage matching funds still have the opportunity to successfully be awarded Mitigation Funds. Measures such as reserving a portion of the available funds for a limited time to designated types of organizations, like rural transit agencies or organizations that serve historically discriminated populations, would decrease the inequity inherent in the reality of securing matching funds. The Coalition urges the Department to reach out to stakeholders to collaborate on remedies for this pressing issue.

Mitigation fund allocations

Criteria for EVSE Investments is Prudent

The Coalition is pleased to see that the Department plans to allocate 15 percent of the Mitigation Funds to light-duty zero EVSE. Because independent operators, private and public utilities and state agencies have all pursued installation of EVSE across Washington, the Coalition encourages the Department to work with these various organizations to ensure optimal installation of new EVSE. Ideally, the Department, in awarding funds to light-duty vehicle EVSE installers, would require analysis supporting the proposed locations of EVSE.

Due to the nascent stage of EVSE deployment, gaps in availability exist as well as ongoing reliability issues with existing EVSE infrastructure. By encouraging transparency of light-duty vehicle EVSE proposals, the Department could ensure that installation of additional EVSE meets a broader range of criteria, like access or availability, rather than allowing for installers to maximize aspects like revenue stream which may not align with optimal market transformation of the transportation electrification industry.

Disproportionately impacted communities

Low-Income/Disproportionate Community Requirement

Though the Coalition appreciates the Department's recognition of the opportunity created by the Mitigation Funds that could provide unique relief to the communities disproportionately impacted by diesel emissions, the Coalition is particularly concerned about the limited language accompanying the single mention of how such an opportunity would be implemented. In the Draft Plan, the Department states, "To the extent practical, Washington will use mitigation funds for mitigation actions that provide air quality benefits in disproportionately impacted communities." The phrase "extent practical" does not indicate that any of the Mitigation Funds will actually benefit these communities in meaningful ways. Compounding this concern is the concern that "extent practical" will fail to address the "disproportionate" aspect of the intent, considering the discrimination these communities have historically faced, especially in receiving targeted relief.

The Coalition urges the Department to include discrete and effective measures within the project evaluation process to ensure that these communities are guaranteed to benefits from Mitigation Funds. These measures include, but are not limited to, a carve out of the allocation of funds that is exclusively for qualifying communities, a bonus in whatever rankings or evaluations for any project that meets certain requirements, or staged disbursement of funds in order to allow for assessment of the types of projects seeking funding and the opportunity to modify program structure in case insufficient Mitigation Funds are being awarded to qualifying communities.

General comments

Transparency and Access to Data

The Coalition believes an additional priority that the Department should consider is a project's ability to generate useful and transferable information, and that any information, to the maximum permission under law, is publicly available. The very fact that the funds were awarded to the State of Washington indicates the funds and any ensuing benefits belong to all Washingtonians. Organizations should be prevented from keeping any information confidential that would otherwise allow for the advancement of the Department's goals by other organizations unless reasonable evidence can be provided that any information is trade sensitive.

Right now, electric utilities in Washington and across the country are operating EVSE and electric

vehicle pilots, analyzing the generated data to determine impacts to customers and grid as well as how to optimize benefits. By requiring this information be made available, the potential for every dollar spent to reduce diesel emissions from additional, different projects well into the future raises considerably. The Coalition encourages the Department to collaborate with stakeholders to develop data reporting templates and requirements.

Affiliated Tribes of Northwest Indians
AirWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Allumia
Alternative Energy Resources Organization
American Rivers
Backbone Campaign
Beneficial State Bank
BlueGreen Alliance
Bonneville Environmental Foundation
Centerstone
Citizens' Utility Board of Oregon
City of Ashland
City of Seattle Office of Sustainability & Environment
CleanTech Alliance
Climate Solutions
Community Action Center of Whitman County
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
Earth and Spirit Council
Earth Ministry
Ecova
eFormative Options
Energy350
Energy Savvy
Energy Trust of Oregon
Environment Oregon
Environment Washington
EQL Energy
Forth
Home Performance Guild of Oregon
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Idaho Clean Energy Association
Idaho Conservation League
Idaho Rivers United
Interfaith Network for Earth Concerns
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Montana River Action
National Center for Appropriate Technology
National Grid
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Council
NW Natural
OneEnergy Renewables
Opower
Opportunities Industrialization Center of WA
Opportunity Council
Oregon Energy Fund
Oregon Environmental Council
Oregon Physicians for Social Responsibility
OSEIA
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Portland Energy Conservation Inc.
Portland General Electric
Puget Sound Advocates for Retired Action
Puget Sound Cooperative Credit Union
Puget Sound Energy
Renewable Northwest
Save Our wild Salmon
Seattle City Light
Seinergy
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Sierra Club, Washington Chapter
Small Business Utility Advocates
Smart Grid Northwest
Snake River Alliance
Solar Installers of Washington
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeast Idaho Community Action Partners
Spark Northwest
Spokane Neighborhood Action Partners
Sustainable Connections
The Climate Trust
The Energy Project
UCONS, LLC
Union Of Concerned Scientists
United Steelworkers of America, District 12
US Green Building Council, Idaho Chapter
Washington Environmental Council
Washington Local Energy Alliance
Washington Physicians for Social Responsibility
Washington State Department of Commerce
Washington State University Energy Program
YMCA Earth Service Corps



From: Michael Breish
Policy Associate
NW Energy Coalition

December 18, 2017

To: Washington Department of Ecology
Air Quality Program
Brett Rude

Re: Washington's Draft Mitigation Plan for VW Settlement Funds

The NW Energy Coalition (Coalition) appreciates the opportunity to provide written comments on Washington's Department of Ecology's (Department) "State of Washington Proposed Volkswagen Beneficiary Mitigation Plan" (Draft Plan), which provides objectives, principles, and a framework for investments that the Department can utilize in pursuing its pollution reduction goals as a result of diesel emissions from certain Volkswagen (VW) vehicles. The Department anticipates it will receive \$112.7 million dollars from the VW Environmental Mitigation Trust (Mitigation Funds).

The Coalition is a 37-year old non-profit organization whose approximate 100 members are composed of environmental, civic, and human service organizations; progressive utilities, and businesses that are located in Oregon, Washington, Idaho, Montana and British Columbia. The Coalition and its members advocate a clean and affordable energy future for the region based on:

- Meeting all new energy demand with energy efficiency and new renewable resources;
- Full and fair accounting for the environmental effects of energy decisions;
- Protecting and restoring the fish and wildlife of the Columbia River Basin;
- Consumer and low-income protection; and
- Informed public involvement.

Because a key pathway for achieving the Draft Plan's pollution reduction goals relies on electrifying existing or future fossil-fuel based transportation, the Coalition and its members have significant interest in providing guidance to the Department as it continues to refine its mitigation plans. The Coalition has extensive history participating in state and regional efforts to design effective electric sector policy and is actively involved in Oregon and Washington

states' efforts in electrifying their respective transportation sectors. Thus, the Coalition is uniquely positioned to assist the Department in its Mitigation Funds process.

Overall, the Coalition finds the Draft Plan positions Washington to invest the Mitigation Funds in diverse and strategic ways that will likely result in successful reductions in diesel emissions. We appreciate the work that the Department has done so far and its continued efforts in seeking public input. In submitting this document, the Coalition aims to provide the Department with comments, concerns and requests on multiple components of the Draft Plan.

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The Coalition supports the Draft Plan's stated goals and resulting scope, which results from the specific nature of VW's injury to the citizens of Washington. The goals are satisfactory as is and create clear intent for project evaluation and execution. The identified principles provide necessary context and direction for the goals, but the types of projects later highlighted in the Draft Plan demonstrate the consideration of another principle: leverage co-benefits beyond air quality for all Washingtonians. For example, by investing in electric road or off-road vehicles, utilities' existing generating resources can better utilized which can deliver cheaper electric rates to all customers. Another example is that organizations can use funds to introduce pilots on existing technologies, like electric port equipment, allowing use cases to be explored for similar organizations in Washington. We recommend adding this principle to the others provided in the draft plan.

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in the state. This potential scenario ties back to the Coalition's suggested principle described earlier in these comments.

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¹ See "Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services," Docket No. UE-160799, June 14, 2017.

is the risk from investing in cleaner, fossil-fuel based engines that may become obsolete in the near- to mid-term. The Coalition believes the best way to mitigate this risk is to review projects on a case-by-case basis in order to research the pertinent markets in order to ascertain the status of available technologies and the resulting risk. The emphasis in this type of project review should be a long-term cost/risk benefit analysis to ensure that funds are spent effectively to maximize emission reductions, health benefits and other objectives.

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² Department of Ecology, “State of Washington Proposed Volkswagen Beneficiary Mitigation Plan,” at page 18, November 15th, 2017 (emphasis added).

the Mitigation Funds will actually benefit these communities in meaningful ways. Compounding this concern is the concern that “extent practical” will fail to address the “disproportionate” aspect of the intent, considering the discrimination these communities have historically faced, especially in receiving targeted relief.

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Due to the nascent stage of EVSE deployment, gaps in availability exist as well as ongoing reliability issues with existing EVSE infrastructure. By encouraging

³ Ibid., at page 15.

transparency of light-duty vehicle EVSE proposals, the Department could ensure that installation of additional EVSE meets a broader range of criteria, like access or availability, rather than allowing for installers to maximize aspects like revenue stream which may not align with optimal market transformation of the transportation electrification industry.