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July 19, 2023

Washington Utility and Transportation Commission PO Box 47250 Olympia, WA 98504-7250

Re: Docket U-2021-210553

Dear UTC Commissioners,

The Building Industry Association of Washington (BIAW) gives a voice to 8,000 members including builders, remodelers, and skilled trades professionals. On behalf of our members, we thank you for the opportunity to discuss the decarbonization pathways currently identified in Docket U-2021-210553.

Upon reviewing the dashboard compiled by SSG, it's troublesome to see every plan for decarbonization calling for a complete dismantling of the natural gas industry by 2050. The building industry does not support an energy decarbonization plan that promotes a consolidated and coercive monopolistic energy market. Diversification of energy sources and its delivery to homes and businesses doesn't just protect consumers from price-gouging, it also ensures there's another energy option in the event of a cyberattack on electrical grids; a serious trend that has been increasing in recent years.

According to a recent survey, 72% of Washingtonians desire to make their own energy choices. As such, BIAW supports the Alternative Fuel scenario – with the inclusion of RNG for the long-term – for adoption. There are millions of dollars of investments in existing and new natural gas infrastructure. It simply does not make sense to abandon the natural gas industry without providing the industry time to further scale up RNG, utilizing the same infrastructure.

Relying on widespread rooftop solar deployment – according to SSG's dashboard – is expensive. To illustrate, three solar panels on the roof of a home costs approximately \$6,000. The typical house would require between 10 and 20 solar panels to completely offset the average annual electricity consumption and at a minimum would cost \$24,000.

Further, energy sources such as solar and wind are variable (depending largely on the location, surrounding vegetation and buildings, and roof exposure to sun) and in the absence of a utility-scale battery system, there is no mechanism to store the energy from these sources. Until a utility-scale battery system is developed and on-the-market, this component should not be included in any modeling. Another component that should not be included in this model is geothermal energy for site usage. In today's market, the expense for geothermal systems per home can range from \$15,000 to \$40,000; depending on the system selected.

Additionally, solar, wind, and utility-scale battery systems will require land for siting. As we've seen recently with wind and solar farms, a majority of these are being placed in rural Washington, many times at the objection of residents. Placing the burden of producing energy for the state on the backs of our rural citizens is inequitable. Noise and light pollution are real concerns that must be addressed, as well as how these sites would fit within the aesthetic of these communities.

As stated previously, the industry prefers adoption of the Alternative Fuels pathway with the inclusion of RNG. As stated in the SSG dashboard, this pathway would be the least cost option and would not significantly energy burden households. This pathway makes the most sense in the near-term because it allows for the renewable energy and energy storage sectors to evolve and allows for electrical grid investments and construction. Providing more time for these aspects of planning is crucial to ensuring Washingtonians' quality of life is not diminished.

Sincerely,

Jan Himebaugh Director of External Affairs