

# Compliance with Public Utility Regulatory Policies Act RES

Economic Development, Technology & City Light  
Committee

Sept. 13, 2023



Seattle City Light

WE POWER SEATTLE

# Public Utility Regulatory Policies Act (PURPA)

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- In 1978, Congress passed the Public Utility Regulatory Policies Act (PURPA) as part of the National Energy Act.
- PURPA tailed the 1970s energy crisis, with a two-fold purpose:
  - Energy conservation (reduce demand),
  - Domestic energy & renewable energy (increase supply).
- PURPA realized this by promoting energy projects (e.g., QFs) and industry transformation, the latter through energy "standards."
  - Standards propose initiatives for state regulatory bodies, including municipals such as City Light, to consider for adoption.
- PURPA originally included five standards; with additional standards added over the years.

# New Requirements under PURPA

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- In 2021, Congress amended PURPA through the Infrastructure Investment & Jobs Act (Jobs Act) and added two new standards.
- Entities "shall consider" adopting 1) demand response, and 2) vehicle electrification policies.
  - "Shall consider" is a procedural requirement – an evaluation!
    - PURPA imposes no duty to adopt a standard.
  - Waivable if entity or state has already adopted comparable standards.
- Proposed Council Resolution documents City Light's compliance with the new requirements.

# Demand Response (DR)

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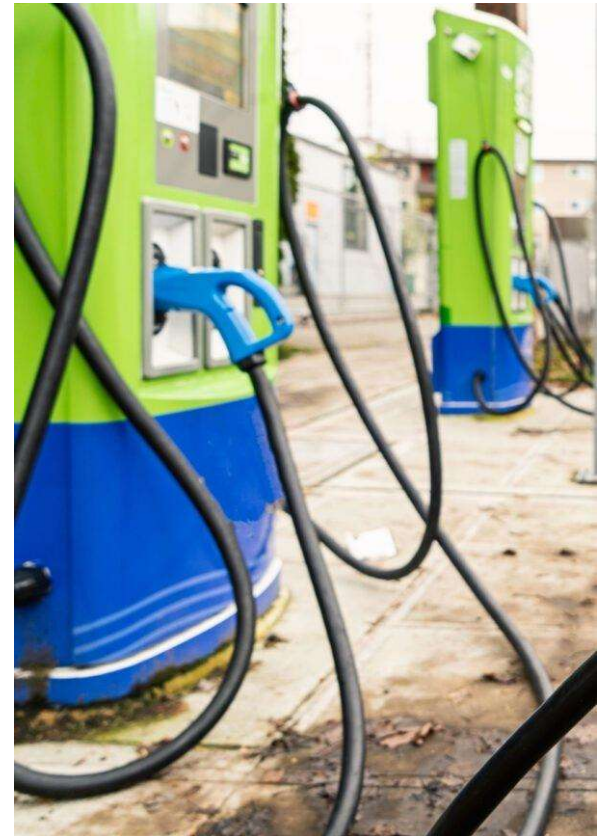
- Jobs Act standard on DR:
  - “Each electric utility shall promote the use of demand-response and demand flexibility practices . . . to reduce electricity consumption during periods of unusually high demand . . .” ([16 USC § 2601\(d\)\(20\)](#))
- City Light already complies with a comparable WA State DR standard:
  - City Light has assessed DR potential as required by WA State Dept of Commerce regulations ([WAC § 194-40-200](#)) and state integrated resource planning requirements ([RCW § 19.280.30\(1\)\(b\)](#))



# Transportation Electrification (TE)

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- Jobs Act standard on TE:
  - “Each State shall consider measures to promote greater electrification of the transportation sector. . . .” (16 USC § 2601(d)(21))
- City Light already complies with comparable WA State/city TE standards
  - City Light has adopted a four-year TE Strategic Investment Plan (Res. 31971) consistent with the state TE Act (RCW § 35.92.450)
  - City Light continues to advance numerous TE projects consistent with the Plan



## Purpose of Council Resolution

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- City Light must consider adopting Jobs Act/PURPA standards on DR and TE, unless we already adhere to comparable standards.
- City Light already adheres to comparable TE and DR standards via recent WA State/City Light policies.
- City Light precedent to document compliance via City Council resolution.
- The Resolution concludes City Light's compliance obligation with Jobs Act/PURPA requirements and reiterates the utility's decarbonization efforts.

# THANK YOU

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