

## Seattle City Light Review Panel

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***Sent via email and hand delivery***

Honorable Jenny A. Durkan  
Mayor, The City of Seattle  
600 4th Ave, Seattle, WA  
7th Floor  
Seattle, WA 98104

### **RE: Review Panel Recommendations on 2019-2024 City Light Strategic Plan**

Dear Mayor Durkan:

We are pleased to submit to you our recommendations with respect to the proposed City Light Strategic Plan for 2019-2024 (the "2019 Plan"). We endorse the 2019 Plan, with some important caveats and concerns as noted in this letter. ~~It is heartening to see an emphasis on equity among City Light's priorities as we experience the tremendous growth in Seattle and the surrounding region. Every strategy to create and sustain a healthy and diverse economy should acknowledge the diversity of people and employers upon whose shoulders the region was built – not one industry, not one neighborhood, not one skill set – but many. That's one reason that our~~ Our primary concern with the current draft of the Plan is the projected revenue requirement and implications for electricity rate increases over the next six years.

*As a Panel, we are ringing the alarm bell: it is time to place much more focus on controlling the Utility's costs going forward, and to address rate design.* Continual rate increases that significantly outpace the rate of inflation are threatening the manufacturing sector of our economy and jeopardizing the livelihood of the thousands of men and women that work that work there.

~~While we understand the reasons behind the revenue requirement projection, we think that~~ The projected rate of growth in the City Light's operating and capital costs – and thus, electricity rates – is not sustainable. City Light has entered a new reality of declining retail demand that is projected to continue for the foreseeable future. Major effort is required to reduce the trajectory of growth in operating and capital costs at City Light, and this should be a high priority for the City's leaders and the Utility. ~~on behalf of a diverse, equitable future that benefits everyone.~~

### The Planning Process

This is a new strategic plan. ~~The original 2013-2018 strategic plan ("Original Plan") was adopted in 2012, and updated every two years (the "2014 Update", and "2016 Update", collectively~~

referred to as the "Updates"), on a rolling six-year basis. The Review Panel, with evolving membership, has been in place since 2010 to advise the Utility, Mayor and Council on development of the strategic plan and other issues. Since June of 2016, we have met 24 times, for three hours per meeting, considering the issues in this new 2019 Plan. While we are not a Panel of experts, our members represent the wide range of customers served by City Light—from low income households, to working families, to industrial customers, to energy efficiency advocates, to cities with franchise services from City Light.

### Customer Outreach

In addition to engaging with the Panel, the Utility has completed an impressive outreach effort to customers as part of the strategic planning process. Feedback garnered from this outreach was positive, and noted three themes with respect to what customers want from City Light: reliability, affordability and rate predictability. This input was secured before the rate path was revealed.

### Success since Adoption of the 2013-2018 Strategic Plan

City Light has had important successes in many areas since adoption of the Original Plan. It is important to mention these, because we strongly support continuation of the current strategic planning process. Since 2012:

- There has been a significant reduction in the rate of employee injuries at City Light.
- Utility leadership and employees observe significant improvement in the condition of the Utility's infrastructure
- There has been solid progress on the vast majority of over 30 initiatives in the Original Plan—the focus of which was on upgrading and modernizing aging infrastructure.
- Enrollment in the Utility Discount Program has increased dramatically (while this shifts costs to other customers, it is important progress in terms of social equity).
- The Utility has implemented an outage management system.
- The Climate Adaptation Plan proposed in the Original Plan has been completed.
- The Utility has maintained the rate path to which it committed for the first two years of the Original Plan and the first two years of both Updates.
- Efficiency targets have been met.
- A new retail power sales forecast methodology has been developed, and the 2019 Plan incorporates a forecast based on this updated methodology.
- The strategic planning process has served its fundamental goal of syncing operations and capital planning to the Utility's budgets and rates, promoting policy-driven budget decisions.

## Current Challenges

The context in which the Utility finds itself has evolved significantly since 2012. The most significant change is the arrival of something other utilities around the county have been experiencing for some time: *declining retail demand for power*. We first noted concern that this might be a long-term situation in 2014, and again in 2016—when we supported the need for a new forecast methodology. That The new more comprehensive load forecast forecasts an average annual decline in *retail electricity sales to decline of -0.4% per year over the next 20 years*. And in fact, City Light has collected about *\$118 million less in retail revenue than projected in the last five years due to lower retail demand than forecast*.

How can retail demand for electricity be declining as Seattle's economy is booming? In part, it is due to the success of the Utility's (and others') energy efficiency efforts. The forecast estimates 2.0% to 2.5% annual reductions in total retail demand due to efficiency—in appliances, building design and construction codes and standards.

Residential consumption is projected to continue to decline as more of the population lives in multifamily housing. However, most of the cost effective energy efficiency has been harvested from the residential sector. The Utility is now increasing its energy efficiency focus on commercial customers. Very slow growth in demand is forecast from the commercial sector. Industrial power demand is forecast to decline slowly over the next 20 years, due to both a decline in employment from this sector (-0.2%/year) and new efficiencies.

The biggest cost driver for the Utility continues to be its very large capital investment program—which has been necessary in order to upgrade infrastructure. Debt service on capital spending and debt service coverage accounts for 48% of expected growth in revenue requirements over the next 6 years. The Utility's debt service plus debt service coverage will account for \$402.5 million in rate revenues in 2019 (43% of the 2019 estimated total revenue requirement), growing to an expected \$508 million in 2024 (45% of the 2024 estimated total revenue requirement).

It was important to strengthen the condition of City Light infrastructure. At this point, however, we need more focus on controlling future capital costs.

*Changes in energy markets pose new risks* for City Light that could cause significant disruption in power demand. Third party actors are seeking to compete in the same market space as the Utility. Wholesale power demand remains weak. The price of renewable energy and energy storage technology is declining, making them a more attractive alternative to traditional centralized electricity service. Cyber security risks are becoming more sophisticated. These changes must be addressed aggressively to ensure that City Light remains resilient.

Within the Utility itself, we see other challenges:

- There have been significant changes in leadership in recent years, and these are ongoing.

- Major cost overruns have been experienced on some large projects—the Denny Substation, the new customer billing system—for various reasons.
  - The Denny Substation project had an early engineering cost of \$89 million, which grew to \$173 million within two years as urban design requests were added to the project, and a street vacation was necessitated by those changes. The project was ultimately constructed for \$209.5 million. These costs do not include a second transmission feeder line to the substation (\$66 million) or the build-out of the substation network (\$65.7 million).
  - The customer billing system experienced a 60% cost increase, from \$68 million to \$110 million.
- City Lights fees owed for internal services received from other City Departments are growing at increasing rates—particularly centralized Information Technology and Human Resources.
- City Light is required to expend substantial funds to move its infrastructure due to many transportation projects (City, WSDOT and Sound Transit). For example, the cost of utility relocations required by the Alaskan Way Viaduct and Seawall projects is estimated at \$82.4 million in ratepayer dollars in the 2018–2024 period
- Maintaining the rate path commitment in the strategic plan required deferring several capital projects, creating some concern about a future bow wave of capital spending.
- Declines in *wholesale revenue* have required a 1.5% surcharge on customer bills since August 2016 in order to replenish the Rate Stabilization Account.
- City Light has not been allowed to proceed with sales of surplus land that would generate substantial proceeds to mitigate rate increases *in the near term*.

Fortunately, there are a few opportunities on the horizon to *increase revenue*, both of which would be addressed by initiatives proposed in the new 2019 Plan:

- Evolution of market opportunities to buy and sell interruptible power (“Energy Imbalance Markets”).
- Slow, but increasing adoption of electric vehicles and residential/ commercial solar (Utility funds are being used to promote growth in these areas).

Finally, in understanding City Light’s current context, it’s important to note a few things that *have not changed since the Original Plan*:

- On the positive side, we see a continued strong focus on environmental stewardship.

- ~~• More concerning, half of SCL employees are still able to retire in the next 5 years. A drain of skilled trades' employees would be very difficult to replace. And current labor rules makes succession planning even harder.~~
- ~~• City Lights' expenses continue to climb well over the rate of inflation each year.~~

## 2019-2024 Strategic Plan

- **Plan Priorities**

The core priorities in the strategic plan have evolved since 2012, and we think it is important to note why this has happened. The Original Plan priorities—concepts which remain relevant and important -- were:

- Improve customer experience and rate predictability
- Increase workforce performance and safety practices
- Enhance organizational performance
- Continue conservation and environmental stewardship leadership

Given the Panel's concern about the continuing level of rate increases, we have asked that "*affordability and rate predictability*" be pulled out as a new priority, rather than be subsumed under customer service. Because "*affordability*" means different things to different people, we want to clarify that our focus on affordability arises out of our concern about the fact that City Light's rates continue to increase much faster than inflation.

On the positive side, in the last six years the Utility has made tremendous strides in workforce safety and improving its infrastructure: these priorities are now merged under the priority of "*Continuing City Light's Core Business.*" The 2019 Plan priorities, which we support, are:

- Customer service
- Affordability and rate stability
- Clean energy and environmental stewardship, and
- Continuing City Light's Core Business

We note that with the new billing system and impending implementation of automated metering infrastructure, customer service has and will continue to be an important priority. The City-wide emphasis on race and social justice has been embraced by City Light, to its credit. Customer service for all customers—be they large industrial customers, or Utility Discount Program Clients—needs to be a continued focus for City Light.

- **Baseline Expenditures**

As noted, we have an overall concern about rate of growth in baseline. We do not think this is sustainable in an environment where demand is declining. This challenge is exacerbated by current rate structure. This is the primary concern we believe that the Utility, with the necessary support from the Mayor and Council, must address in the next few years.

- **Seven Initiatives**

The Panel unanimously supports the seven initiatives in the 2019 Plan, except that we are divided on the scope and scale of the evolving energy market's initiative. ~~We commend the Utility for reducing the number and cost of proposed initiatives as compared to the Original Plan. Importantly, none of the new initiatives require additional revenue—they will be funded by shifting emphasis within existing budgets. That said,~~ It is important to note that to the extent that these initiatives reflect implementation of City policy choices (as opposed to a state or federal regulatory mandates), they do present opportunities for reducing City Light's costs. We think it is now necessary to examine these and other cost saving opportunities. We also note that savings are projected from several of the new initiatives, but those savings are not built into the rate path.

- **Rate Path**

As reflected in the second paragraph of this letter, the Panel believes that the *immediate and direct focus of the City leadership and City Light Leadership should be on controlling the Utility's costs and addressing rate design moving forward.* This is necessary if we are to avoid a future of spiraling rate increases. ~~We don't underestimate the challenge here. Managing a billion dollar a year utility with so many fixed costs was a challenge before we entered a reality of declining demand. This new reality makes things all the more difficult. At least one-quarter of the rate pressure in the next several years arises from the new retail demand forecast. The City needs to tackle this head-on. We need to see more focus on addressing this foundational change in City Light's economics.~~

~~The City's residential customers have long benefitted from some of the lowest power rates in the nation—a result of the legacy of hydropower in the Northwest. However, the continuous growth in rates at levels well above inflation creates risks to our local economy. Our industrial and manufacturing businesses competing nationally may be challenged to remain competitive unless something changes. Fortunately, there are opportunities to bend City Light's cost curve that are within the control of City leaders.~~

The growth in the Utility's costs since 2012 is illustrated in **Attachment 1**. While City Light has commendably met its revenue requirements in each of the first two years of the Original Plan and two subsequent Updates, each strategic plan Update—and the new 2019 Plan—has resulted

~~in actual rates higher than were earlier estimated. Cost increases have been front-loaded into each plan and update, as they are again in the 2019 Plan. Lower cost increases projected for the out-years have not materialized.~~

~~The 2019 Plan's proposed revenue requirements in 2019 and 2020 are much lower than they would otherwise have been, thanks to substantial effort by the Utility to find ways to smooth the rate path, including removing some large capital projects from the capital improvement program assumptions.~~

~~What can be done to control costs? The Utility's costs are largely fixed, given the huge legacy investment in dams, transmission lines, and the power poles and lines strung across the City. As such, when demand declines it is difficult to commensurately cut costs. In a situation of declining demand, rates will go up even if costs are flat from year to year. This can become a vicious cycle of endless rate increases—particularly where, as is true for City Light, the rate structure is overwhelmingly based on consumption-based charges. We are told that ninety percent of City Light's revenue recovery is based on variable charges, while 45% of the Utility's costs are fixed. It is unclear to us whether that 45% includes only federal and state mandates or includes City imposed mandates as well. There are other approaches to rate design that can mitigate rate pressure, and they must be considered. But rate design is separate issue from the growth in the underlying revenue requirement: *both need to be addressed.*~~

We are not in a position as a customer Panel to dictate how to cut City Light's budget. However, seven actions that we think would be helpful are:

- Step up the focus on the changing electric utility industry. If City Light is to be resilient in the face of growing uncertainty, it must deploy additional staff time to plan how best to guard against--or take advantage of—these changes. We recommend the Utility be requested to submit a plan for its response to these issues to the Panel within the next year or two at most, for our consideration and comment, and subsequent transmittal to the Mayor and Council.
- Undertake a holistic benchmarking effort. This has not been done since 2011, although we commend the Utility for its ongoing targeted, programmatic benchmarking work.
- ~~Rates in the next two years could be substantially reduced if the Utility is allowed to proceed to sell surplus properties.~~
- Examine options or efficiencies to reduce the increasing cost of central services that City Light is required to purchase.
- Reconsider the scope and scale of discretionary programs that are adding to the Utility's costs. We have not been provided with data that can confirm how big the costs associated with these discretionary programs are, and it is thus not possible for us to offer informed policy advice to you about priorities for this type of spending.

- Continue to incorporate efficiency targets in the 2019 Plan. With considerable effort the Utility has met all its prior efficiency targets included in the Original Plan and Updates.
- ~~As we suggested in 2016, it would be helpful to create and track a metric that shows how actual customer bills are impacted versus the projected revenue requirement: consumer conservation action can mean that actual bills rise less than the revenue requirement.~~
- Review the capital expenditure program and determine if the level of investment can be reduced without sacrificing safety or reliability. [JP addition]

Panel Member Cal Shirley abstains from endorsing the rate path in the Plan because he feels he has not been provided with summary information with respect to costs of regulatory requirements, City policy directives/mandates, and discretionary spending, that would allow him to support the proposed rate path.

### Conclusion

Despite our strong concern about the trajectory of City Light's costs, we support the 2019 Plan and we continue to strongly support the strategic planning process. The process provides an important longer-term strategic focus on the choices before City Light.

City Light has had many successes since the strategic planning process was launched in 2010. Utility leaders have appropriately focused on stewardship and maintenance of the Utility's infrastructure and employee safety in recent years, and that focus has paid off. City Light has been carbon neutral since 2005: we are participating in a global transition away from carbon that City leaders, the Utility, and its customers can be proud of. Looking forward, we anticipate green power renewable energy and the electrification of transportation will play a growing part in our electric future.

We commend City Light staff, as well as Council and Budget Office staff supporting the Panel, for their responsiveness to our questions and their frank engagement with us on the challenges facing the Utility. Their expertise and work on our behalf is deeply appreciated.

We would welcome the opportunity to speak with you about the recommendations in our letter.

Sincerely

### **Members of the City Light Review Panel**

[Signature blocks]

**Attachment 1: City Light Rate Revenue Requirement\* Increase Over Previous Year**

<i>Strategic Plan Estimate</i>	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
2012 Projected <b>4.7% avg.</b>	4.4%	5.6%	4.1%	4.8%	5.3%	3.9%						
2014 Projected <b>4.4% avg.</b>			4.2%	4.9%	5.0%	3.9%	3.6%	4.9%				
2016 Projected <b>4.3% avg.</b>					5.6%	5.6%	5.0%	3.6%	3.1%	2.5%		
2018 Projected <b>5.07% avg.</b>							6.5%	6.5%	4.8%	4.2%	4.3%	4.1%
<b>Actual 5.05% avg.</b>	4.4%	5.6%	4.2%	4.9%	5.6%	5.6%						

\*Excludes Rate Stabilization Account surcharges and Bonneville Power Administration Pass Through to customers.

[Note to Panel: updates to rates provided by Paula]