

August 23, 2019

U.S. DEPARTMENT OF ENERGY
1000 INDEPENDENCE AVE, SW
MAILSTOP OE-20
WASHINGTON, DC 20585

Attn: Office of Electricity, Guidance for Enhanced Grid Resilience

Seattle City Light (City Light) provides this letter in response to Federal Register Vol. 48, No. 131, Page 32730 - Notice of request for information (RFI) published July 9, 2019. This RFI seeks to “gather ‘relevant consensus-based codes, specifications, and standards,’ state and industry best practices, and other pertinent materials to provide guidance for enhancing the physical and operational resilience of electric grid systems...” City Light appreciates the opportunity to address this topic and provides the following comments.

City Light is one of the largest consumer-owned electric utilities in the United States, serving over 455,000 residential, commercial, and industrial customers in the greater Seattle area. Our mission is to deliver affordable, reliable, and environmentally responsible electricity services to our customers. In meeting our mission, City Light is committed to ensuring our systems are resilient to severe weather events, such as floods, windstorms, and wildfires. With infrastructure located in remote rugged mountains, along the shores of Puget Sound, and across heavily forested wildland-urban interface, City Light is accustomed to preparing for and responding to extreme weather to maintain and restore power and to protect the well-being and safety of our employees and customers.

City Light has actively participated in Department of Energy’s (DOE) Partnership for Energy Sector Climate Resilience as one of the founding members since 2015. The DOE Partnership has developed a collection of current and recommended best management practices for advancing a model resilient electric utility that is prepared for extreme weather. The efforts of the DOE Partnership and amassed best practices are the most comprehensive material applicable to this RFI. As part of this DOE Partnership, City Light developed a [Climate Change Vulnerability Assessment and Adaptation Plan](#) (2015) and a Climate Resilience Strategy (2017) for our utility. These documents include an assessment of observed and projected changes in climate, local climate-related impacts and prioritized vulnerabilities of our infrastructure and systems, potential adaptation strategies and actions for reducing impacts, and an implementation plan. City Light will continue to engage in the DOE Partnership and enthusiastically support the partnership’s continued efforts to develop an extreme weather-based resilience maturity model and resiliency strategies.

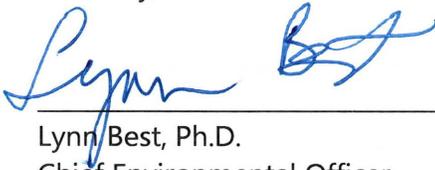
Based on City Light's experience, some best practices we would encourage to facilitate increased extreme weather resilience include:

- Developing utility-specific comprehensive impact assessments that are: 1) based on localized extreme weather data and future projections, and 2) adjusted to evolving conditions and newly identified impacts;
- Creating data, tools, maps, and procedures that support integrating weather-based resilience into decision making; and
- Collaborating and sharing information and experiences among stakeholders, partners, and energy industry.

City Light appreciates DOE's recognition that standards and regulations based on static and historic climate data may not be resilient in a changing environment. We applaud DOE's efforts to compile information, standards, and best practices that may be used to enhance recovery from natural disasters supported by the Federal Emergency Management Agency's (FEMA) implementation of the Disaster Recovery Reform Act of 2018. City Light supports the efforts by DOE and FEMA to facilitate appropriate standards for restoration to withstand the impacts of changing future conditions. This is a sustainable strategy for facilitating resilience to future events and potentially long-term cost savings. We would encourage that any directives from these compiled materials in disaster responses are goal-based and not prescriptive. This approach should provide maximum flexibility for: 1) use of local data and conditions pertinent to the extreme hazard being addressed, and 2) consideration of future changing conditions that promote prudent design and investments for long-term sustainability.

Thank you for providing the opportunity to respond to this RFI and feel free to contact us with any questions or clarifications on our submittal.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lynn Best', is written over a horizontal line.

Lynn Best, Ph.D.
Chief Environmental Officer
Seattle City Light