

November 4, 2019

To: Irena Netik – Puget Sound Energy (PSE) Director of Energy Supply Planning and Analytics

Cc: Jay Balasbas – UTC Commissioner
Rachel Brombaugh – King County Executive Energy Policy & Partnerships Specialist
Brad Cebulko – UTC Staff
Carla Colamonici – Regulatory Analyst, Public Counsel Division
David Danner – Utilities and Transportation (UTC) Commission Chair
Lisa Gafken – Assistant Attorney General, Public Counsel Unit Chief
Steve Johnson – UTC Staff
Ann Rendahl – UTC Commissioner
Deborah Reynolds – UTC Staff
Kathi Scanlan - UTC Staff

Subject: 2019 IRP Technical Input – Don’t replace one fossil fuel with another fossil fuel

Note: The TAG acknowledges the WUTC Staff petition for an IRP schedule exemption. This technical input is submitted in response to PSE’s commitment to “continue to ... maintain and respond to public input”. This technical input should be considered an integral part of the collection of 2019 PSE IRP documents. We appreciate PSE’s commitment to also include these technical inputs in the 2021 PSE IRP.

“The legislature finds that Washington must address the impacts of climate change by leading the transition to a clean energy economy.”¹

“Absent significant and swift reductions in greenhouse gas emissions, climate change poses immediate significant threats to our economy, health, safety and national security.”²

“The legislature declares that utilities in the state have an important role to play in this transition, and must be fully empowered, through regulatory tools and incentives, to achieve the goals of this policy.”³

The intention of the legislature is clear and unambiguous – our state must create a “clean energy economy” and utilities “have an important role to play in this transition”.

¹ Clean Energy Transformation Act, Section 1(1)

² Ibid, Section 1(3)

³ Ibid, Section 1(5)

To this end, and with respect to the now ten- and twenty-five-year timelines to achieve this outcome, it seems imprudent for PSE to replace one fossil fuel-based source of electricity with another. The mandate is clear. The obligation of utilities is also clear.

As TAG members, we formally request that PSE post this letter on their 2019 IRP website and provide a written response to these questions:

- Will PSE commit to replacing their current fossil fuel electricity generation inventory only with electricity generation solutions with a zero or negative carbon emission footprint?
- If not, what situations do you believe would justify continued development of fossil fuel-based electricity generation systems?

Respectfully submitted:

Doug Howell – Sierra Club Beyond Coal Senior Campaign Representative