

**From:** [Jan Keller](#)  
**To:** [UTC DL Records Center](#); [Public Involvement \(UTC\)](#)  
**Subject:** Docket UE-160918 and Docket UG-160919 (PSE's 2017 IRP)  
**Date:** Monday, February 19, 2018 9:10:30 PM

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Dear Commissioners Danner, Rendahl, and Balasbas:  
This is regarding Docket UE-160918 and Docket UG-160919.

I am a Puget Sound Energy (PSE) ratepayer and a resident of Bellevue, WA. Thank you for the opportunity to comment on PSE's 2017 IRP.

This is a crucial time for Washington utilities and ratepayers for two reasons:

- Unmistakable climate impacts are already upon us, for example, the 2015 drought that devastated state agriculture, and the 2017 outburst of summer wildfires that left a pall of smoke over large areas of Washington. These impacts have been very damaging and expensive. Even if an evaluation of the IRP is based only on cost, the cost of climate impacts (such as costs for wildfire control, borne by all Washington residents) will hit ratepayers very hard if we don't react now. We shouldn't have that kind of devastation, and that hidden price, built right into our electricity for years to come.
- Given the present moment, planning that focuses on achieving the lowest practical costs to ratepayers must recognize the sources of electricity that are, or very soon will be, the cheapest: efficiency and renewables (combined with batteries to make the overall system work). If we want to serve ratepayers beyond the next few years, then we cannot lock ratepayers into sources of electricity that soon will fall behind, and cost them far more than the cheapest and best alternatives. Instead, we must plan for the forms of electricity that are even now becoming clear winners in terms of price and value: efficiency and renewables.

For both reasons, I urge you to raise strong objections to any IRP that includes expensive, dirty, outdated energy infrastructure based on burning coal and fracked gas (which is not "clean," since it leaks climate pollutants from the moment extraction starts). At this crucial moment, it is clear that ratepayers receive the most value when all investments are aimed at energy sources that will serve us well into the future: renewables, combined with batteries and efficiency. Please require that PSE reflects this reality in its IRP.

I would like to make some specific points about PSE's 2017 IRP, and the ways it falls short of the blueprint for a carbon free future that will serve Washington ratepayers best. Here are some of my concerns about PSE's 2017 IRP:

- PSE says that it intends to operate its dirty Colstrip plant, despite all the expensive impacts that coal causes in Washington and the rest of the world, for many years to come. Colstrip is the largest climate polluter in the West, generating the same amount of carbon dioxide as 3 million cars. The harm from this is an expense shared by all of society. I appreciate the fact that the smaller Colstrip units 1 and 2 will go off-line no later than July 2022. Now PSE should publicly state an intention to close units 3 and 4 by 2025. That year, 2025, is when the current mine runs out of coal, when nitrogen controls will be required, and also when King County and other communities have made commitments to shift toward all-renewable sources of electricity. Internationally, 2025 is when the Paris climate agreement reaches its first

compliance deadline. For all these reasons and more, Puget Sound Energy must declare it will not waste any more customer money on coal-burning by that date.

- PSE needs to state its plan to close Colstrip completely by 2025 for another reason, which is to enable the Colstrip community to prepare. I want all Washington ratepayers to have ready access to 100% renewable electricity, but I also want a just transition for workers in the Colstrip community. This will require that they have time to enter job retraining and find other ways to ease the transition for their community--in some cases, to jobs connected to renewables such as wind. Even though commissioners at the UTC may see this as secondary, as a ratepayer I see it as extremely important. It is part of being responsible to our neighbors in Montana.
- PSE says it intends to lock Washington into fossil fuels for decades to come by vastly expanding its fracked gas infrastructure over the next 10 years. Fracked gas is another expensive, dirty source of electricity that we must move away from. PSE has proposed building over 700 MW of new gas plants in 10 years. Methane (the main component in fracked gas) is 87 times more damaging to the climate than carbon dioxide. Small amounts of methane that leak from the moment of extraction until actual burning mean that gas causes essentially the same harm (and terrible costs) as coal. By the time the gas reaches a gas facility, it is too late. The expensive damage to our climate is already done.
- PSE recognizes that our peak electricity demand is in winter, and proposes new gas plants as a response. This makes no sense, since we can look to renewable resources such as Montana wind power, which peaks in the winter. It is a perfect complement to other wind resources, such as those around the Columbia basin. If energy can be brought here from fossil-fuel sources in Montana, it can certainly be brought here from wind turbines. PSE should be studying how best to make wind energy available to ratepayers, not making plans for new gas plants.

In summary, as a citizen and ratepayer, I expect Puget Sound Energy to be required to deliver a plan that makes clean energy accessible to every PSE customer, and quickly phases out all fossil fuels: no coal, no fracked gas, and no LNG.

Thank you for your work in ensuring that Washington ratepayers will be offered clean and economical sources of electricity in the years and decades to come.

Sincerely,

Jennifer Keller

Ratepayer, and resident of Bellevue, WA