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Utilities and Transportation Commission Comments on Avista 2017 IRP  
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Global climate change is advancing much more rapidly than projected several years ago. This week the United States government released its fourth National Climate Assessment. It confirmed what we have known for some time: “it is extremely likely that human activities, especially emissions of greenhouse gases, are the dominant cause of the observed warming.” Global climate change is no longer a problem for our children, much less our grandchildren. Climate change is happening now and it is getting worse.

After years of inaction, the nations of the world came together in Paris to commit to keeping warming to less than 2 degrees Celsius above pre-industrial levels. Just today it was announced that, with war torn Syria’s agreement to sign on, the United States is the *only* UN member nation not participating in the Paris Climate Agreement. Luckily, Americans can take meaningful action at local, state, and regional levels to address the climate crisis and mitigate the severity and duration of climate disruption. Chief among these actions is how our utility chooses to make electricity over the several decades.

If we are to avoid crashing through the 2 degrees “guardrail” defined by the Paris Climate Agreement and going over the climate cliff, we have a narrow carbon budget. Indeed, as of today, the world has already used 73.7% of our carbon budget. In the context of an Integrated Resource Plan, the problem is that we have access to 5 times our carbon budget in the form of currently accessible reserves of coal, oil, and natural gas. The math is simple, but daunting. If we are to avoid catastrophic climate disruption, we must keep at least 80% of these fossil fuel reserves in the ground. What does this mean for the creation of electricity in Washington State?

It means that Avista needs to move away from carbon-intensive forms of energy production as quickly as possible. Specifically, since coal is the most carbon-intensive form of energy production, we must urgently move away from coal-based electricity generation. Let’s be clear. To plan to generate electricity from Colstrip Montana’s coal-fired plants into the middle of the 2030s, as our utility proposes, is to *plan* for catastrophic climate change.

As an ethicist, I cannot help but point out that this is a deep injustice to the most vulnerable people on the planet and in our community. Indeed, it is a triple injustice, for the poor have *contributed* the least to *creating* the climate crisis, *benefitted* least from its creation, and have the fewest resources to *adapt* to its effects.

Thus, I submit that, planning to generate electricity from coal for another two decades is not only in direct conflict with the scientific facts, it is morally unjust to the poorest and most vulnerable members of our community.