

From: James Adcock
To: [UTC DL Records Center](#)
Subject: Comments of James Adcock in regards to UE-180271
Date: Wednesday, April 4, 2018 2:45:51 PM

Responding in regards to docket number: UE-180271

Comments of:

James Adcock, Electrical Engineer, Ratepayer
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Title and Date of the Comments:

Comments of James Adcock in regards to UE-180271
4/4/2018

While the PSE RFP UE-180271 [draft] nominally claims to only address DR and Renewable needs, this RFP does not contain any explicit language prohibiting bidding of fossil fueled proposals. In light of PSE's latest post-IRP "sudden magical discovery" of the ability to redispatch [Colstrip] transmission, eliminating capacity need until 2025, PSE now [magically] has the breathing room to truly consider DR and Renewables without jumping to the conclusion that they need even more Natural Gas Peaker Plants. Therefore, I request that WUTC explicitly direct PSE to take this opportunity to explicitly clarify that they will not consider any fossil fueled proposals in this round of RFP, but rather will wait to reconsider any such fossil-fueled needs until after the 2019 IRP cycle -- if then. Who knows, perhaps [for once] PSE will actually discover more ways to defer capacity need during the 2019 IRP -- or will "magically" discover such capacity need deferral -- once again -- immediately after the 2019 IRP.

Quoting from the draft RFP:

"As part of the retirement of Colstrip units 1&2, the company has the opportunity to request that BPA redirect the transmission capacity from Garrison to Mid-C. If transmission rights from Colstrip 1&2 are redirected to the Mid-C, PSE would not have a capacity need until 2025."

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