

May 30, 2023

Commissioner David Danner, Chair
Commissioner Ann Rendahl
Commissioner Milt Doumit
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

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May 30, 2023

RE: Puget Sound Energy Final 2023 Gas Utility Integrated Resource Plan (UTC Docket UG-220242)

Dear Commissioners:

The second sentence in PSE's Executive Summary of their 2023 Gas Utility Integrated Resource Plan (IRP) begins: "We share our customers' concern for the environment..."¹ However, on the same page, they list key objectives for this IRP, which do not include anything about environmental concerns. Conclusion? PSE clearly does not share the environmental concerns of Vashon Climate Action Group members, and we are PSE customers. We understand that we are in a climate emergency that has grown worse and closer to irreversible tipping points with every IRP that PSE creates.

The 2023 report of the **Intergovernmental Panel on Climate Change** has issued warnings stating we must act this decade:

Urgency of Near-Term Integrated Climate Action

Climate change is a threat to human well-being and planetary health (*very high confidence*). There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (*very high confidence*)... The choices and actions implemented in this decade will have impacts now and for thousands of years (*high confidence*).²

Many PSE customers have repeatedly mentioned such environmental concerns to PSE, yet we see no apparent understanding of this dire situation expressed in the IRP or in their preferred portfolio, which continues to sell large quantities of gas through 2050. This lunacy of pretending that we can continue business as usual must stop. PSE's gas business not only generates greenhouse gases that contribute to climate change, it also pollutes local air that is breathed by vulnerable populations even if they don't have gas in their own dwellings. To continue to spew these toxins in large quantities through 2050 is unconscionable and unethical. PSE customers, Washington state residents, humans around the world, and other living organisms across the globe deserve better from PSE.

We have additional concerns with this IRP, including PSE's statement that the IRP "appears to be cost-effective." We expect them to be considering "lowest *reasonable* cost" not simply "cost-effective". We see nothing reasonable in PSE's Gas IRP conclusions, which rely almost exclusively on allowances. We see no reasonable efforts to decarbonize the gas sector, even though they claim that is what utilities are working toward.

PSE has also decided to use a zero-growth scenario. The climate crisis, interests of PSE's customers, legislative initiatives, and municipal actions indicate that we must be on a rapid downward trajectory to

¹ <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=20&year=2022&docketNumber=220242>, P. 1.1

² <https://www.ipcc.ch/report/ar6/syr/resources/spm-headline-statements>

have any hope of saving the planet as we have known it. We support the concerns raised in the Washington Clean Energy Coalition's letter of May 8, 2023³ and urge the UTC to reject this IRP.

Thank-you for your consideration of our concerns.

Vashon Climate Action Leadership Team: (in alphabetical order)

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³ <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=50&year=2022&docketNumber=220242>