From: Sierra Club <information@sierraclub.org> on behalf of Tom Devine

<devineshire@msn.com>

Sent: Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

l am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasing expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Tom Devine 2002 CAPITOLWAY S.E. OLYMPIA, WA 98501-2827 (360) 357-8692

From:

Sierra Club <information@sierraclub.org> on behalf of Danon Mcmahan

<dsmcmahan@q.com>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

2013 AUG 12 PM I2: 5

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and witreasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Danon Mcmahan 214 Blanchard Rd Centralia, WA 98531-9050

From: Sierra Club <information@sierraclub.org> on behalf of Jan Gordon <janimals1

@yahoo.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Jan Gordon 16544 Colony Rd Bow, WA 98232-8512

From: Sierra Club <information@sierraclub.org> on behalf of Jaime Roberts-Jones

<jaimerj@comcast.net>

Sent: Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Jaime Roberts-Jones 22413 92nd Ave W Edmonds, WA 98020-4505 (425) 776-1775

From:

Sierra Club <information@sierraclub.org> on behalf of Frances Blair <fblair39

@seanet.com>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

l am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and breasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Frances Blair 115 Montgomery St Steilacoom, WA 98388-1028 (253) 588-8402

From: Sierra Club <information@sierraclub.org> on behalf of Jeanann Francis

<jeanann.francis@gmail.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Jeanann Francis 720 Seneca St Seattle, WA 98101-2764

From: Sierra Club <information@sierraclub.org > on behalf of Robert Whitbeck

<bob\_whitbeck@yahoo.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Robert Whitbeck 1554 Hillside Dr SE Issaquah, WA 98027-4811 (206) 914-4543

From: Sierra Club <information@sierraclub.org> on behalf of Joel Vancil

<jmvancil@gmail.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Joel Vancil 6041 36th Ave SW Seattle, WA 98126-3007

From: Sierra Club <information@sierraclub.org> on behalf of Mary Corcoran

<msmaryeloise@gmail.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Mary Corcoran 2823 Northwest Ave Bellingham, WA 98225-2334 (360) 733-4886

From: Sierra Club <information@sierraclub.org> on behalf of Tamara Stephas

<tls@stephas.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Tamara Stephas 809 23rd Ave E Seattle, WA 98112-4103 (206) 726-9845

From: Sierra Club <information@sierraclub.org> on behalf of Richard Becker

<rbeckersea@aol.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Richard Becker 6822 32nd Ave NE Seattle, WA 98115-7249 (206) 406-1771

From:

Sierra Club <information@sierraclub.org> on behalf of Marilyn Gould

<marilgould@charter.net>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Marilyn Gould 702 SE Heron Dr College Place, WA 99324-2604

From:

Sierra Club <information@sierraclub.org> on behalf of Joseph Brown

<michellecja@gmail.com>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Joseph Brown 2006 Boyer Ave E Seattle, WA 98112-2926 (206) 322-7836

From:

Sierra Club <information@sierraclub.org> on behalf of Maureen Burns <maureen4718

@aol.com>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Maureen Burns 28229 241st Ave SE Maple Valley, WA 98038-5151

From:

Sierra Club <information@sierraclub.org> on behalf of Preston Sahabu

<sahabp@uw.edu>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

2013 AUG 12 PA 12: 58

Preston Sahabu 4343 Roosevelt Way NE Seattle, WA 98105-4776

From: Sierra Club <information@sierraclub.org> on behalf of r hyde

<manjopansy@yahoo.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

r hyde 8300 Steamboat Island Rd NW Olympia, WA 98502-9660

From: Sierra Club <information@sierraclub.org> on behalf of Anne Schreibe

<anneschreibe@yahoo.com>

Sent: Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Anne Schreibe 14623 9th Ave S W Burien, WA 98166 (206) 241-4457

From:

Sierra Club <information@sierraclub.org> on behalf of L Mallett <lmallett@lihi.org>

Sent:

Sunday, August 11, 2013 9:48 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

L Mallett 223 Yesler Way Seattle, WA 98104-2638

From: Sierra Club <information@sierraclub.org> on behalf of Toni Schwellinger

<tschwell@yahoo.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Toni Schwellinger 4465 Victory PI SW Port Orchard, WA 98367-7440

From: Sierra Club <information@sierraclub.org> on behalf of Dennis Smith

<safetywork4u@aol.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Dennis Smith 5723 Schornbush Rd Deming, WA 98244-9222

From: Sierra Club <information@sierraclub.org> on behalf of Tom Devine

<devineshire@msn.com>

**Sent:** Sunday, August 11, 2013 9:48 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Tom Devine 2002 CAPITOLWAY S.E. OLYMPIA, WA 98501-2827 (360) 357-8692

From: Sierra Club <information@sierraclub.org> on behalf of Duane Niatum

<niatumd@hotmail.com>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Duane Niatum 2826 NW 62nd St Seattle, WA 98107-2512 (206) 782-0110

From:

Sierra Club <information@sierraclub.org> on behalf of Patti Wright <pwright333

@comcast.net>

Sent:

Sunday, August 11, 2013 9:18 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for ANOTHER 20 years!

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the TRUE COST of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal. From carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

- 1) No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted in a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."
- 2) No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in ANNUAL costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.
- 3) No consideration of potential SO2 non-attainment costs and UNDERESTIMATION of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.
- 4) No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.
- 5) PSE's planning process lacks TRANSPARENCY. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and MISLEADING. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to CRITICALLY evaluate PSE's long range plan and have them incorporate the true cost of coal.

Thank you.

Sincerely,

Patti Wright 2 Bracken Pl Bellingham, WA 98229-4405 (360) 778-3047

From: Sierra Club <information@sierraclub.org> on behalf of Shannon And Ted Romer

<sbromer@gmail.com>

Sent: Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Shannon And Ted Romer 2557 9th Ave W Seattle, WA 98119-2264 (206) 352-6939

From: Sierra Club <information@sierraclub.org> on behalf of Valoyce Mulanix

<suemulanix@gmail.com>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-12076)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Valoyce Mulanix 6561 Phinney Ave N Apt 215 Seattle, WA 98103-5255

From: Sierra Club <information@sierraclub.org> on behalf of Barbara Meyer

<br/><birdpillows@comcast.net>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Barbara Meyer 114 SE 103rd Ave Vancouver, WA 98664-4045

From: Sierra Club <information@sierraclub.org> on behalf of Yolanda Markle

<yollym@comcast.net>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Yolanda Markle 5309 204th Street Ct E Spanaway, WA 98387-5790 (253) 847-4375

From: Sierra Club <information@sierraclub.org> on behalf of Richard Wertz

<wertzwhitman@frontier.com>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Richard Wertz PO Box 441 Snohomish, WA 98291-0441

From: Sierra Club <information@sierraclub.org > on behalf of Mary Ekman

<maryann@ekmanlaw.com>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Mary Ekman 4726 W Roberts Way Seattle, WA 98199-1801

From: Sierra Club <information@sierraclub.org> on behalf of Mary Jo Moeschl

<mjmphd@yahoo.com>

Sent: Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Mary Jo Moeschl 1658 Discovery St Walla Walla, WA 99362-5010 (509) 240-7152

From: Sierra Club <information@sierraclub.org> on behalf of Christine Cranston

<cpcranston@gmail.com>

**Sent:** Sunday, August 11, 2013 9:18 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Christine Cranston 3270 Walnut Ave SW Seattle, WA 98116-3441 (206) 932-5319

From: Sierra Club <information@sierraclub.org> on behalf of Patricia Ronald

<ple><pleckenby@gmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Patricia Ronald 1120 8th Ave Apt 502 Seattle, WA 98101-2563 (206) 327-9042

From:

Sierra Club <information@sierraclub.org> on behalf of Kathy Seabrook <ladylane99

@hotmail.com>

Sent:

Monday, August 12, 2013 2:08 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Kathy Seabrook 1906 C St Vancouver, WA 98663-3330 (360) 258-7165

From: Sierra Club <information@sierraclub.org> on behalf of Stephanie Weaver <stephw78

@hotmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Stephanie Weaver 7432 NE 58th Way Vancouver, WA 98662-5487 (360) 718-7279

From: Sierra Club <information@sierraclub.org > on behalf of La Belle Urbanec

<jurbanec2001@yahoo.com>

UTC DL Records Center

**Sent:** Monday, August 12, 2013 2:08 PM

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

To:

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

La Belle Urbanec 2159 Lummi Shore Rd Bellingham, WA 98226-9243 (713) 822-1649

From: Sierra Club <information@sierraclub.org> on behalf of Lin Provost

<linprovost@gmail.com>

**Sent:** Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Lin Provost 3707 42nd Ave S Seattle, WA 98144-7205 (206) 723-1026

From: Sierra Club <information@sierraclub.org> on behalf of Patricia Eckenby

<pleckenby@gmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

ب

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Patricia Eckenby 1120 8th Ave Apt 502 Seattle, WA 98101-2563 (206) 327-9042

From: Sierra Club <information@sierraclub.org> on behalf of Marianne Larkins-Strawn

<mari.larkinss@gmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Marianne Larkins-Strawn 16415 NE 11th St Vancouver, WA 98684-9414 (360) 892-1603

From: Sierra Club <information@sierraclub.org> on behalf of Leon And Valerie Reeves

<Ideebug@comcast.net>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Leon And Valerie Reeves 2205 Sleater Kinney Rd SE Lacey, WA 98503-3160 (360) 438-5676

From: Sierra Club <information@sierraclub.org> on behalf of Chris Hawkins

 $<\!christopher hawkins@hotmail.com\!>$ 

**Sent:** Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Chris Hawkins 15255 Sunwood Blvd Tukwila, WA 98188-7717

From: Sierra Club <information@sierraclub.org> on behalf of Robert Day <robday1927

@gmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

ည

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Robert Day 10231 Radford Ave NW Seattle, WA 98177-5439 (206) 783-7579

From: Sierra Club <information@sierraclub.org> on behalf of Ursula Mass <ursmas919

@gmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan. (UE-120257)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Ursula Mass 15797 Snee Oosh Rd La Conner, WA 98257-8927 (360) 466-3257

From: Sierra Club <information@sierraclub.org> on behalf of Judy Barnes

<catsnchoclt@hotmail.com>

Sent: Monday, August 12, 2013 2:08 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Judy Barnes PO Box 176 Rochester, WA 98579-0176

From:

Sierra Club <information@sierraclub.org> on behalf of James Flynn <antawn11

@hotmail.com>

Sent:

Monday, August 12, 2013 2:08 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

James Flynn 706 N 87th St Seattle, WA 98103-3802

From:

Phil Robison <phil@mt.net>

Sent:

Monday, August 12, 2013 1:53 PM

To:

**UTC DL Records Center** 

Subject:

2013 Integrated Resource Plan, Dockets UE-120767 and UG-120768

#### Dear Commissioners,

I am contacting you as an individual with a great interest in Montana. As you know, Puget Sound Energy (PSE) is the single largest owner of the Colstrip coal-fired power plant in Eastern Montana. As an aging coal-fired power plant, Colstrip has several environmental and public health issues that the WUTC should take into consideration when reviewing PSE's Integrated Resource Plan (IRP).

It's well known that Colstrip's waste-water impoundments have been leaking and contaminating the underlying aquifer for decades. This has had adverse impacts on water quality and agriculture in the area, and recently triggered a \$25 million settlement with 57 affected residents. As you are well aware, the problems of coal ash contamination are a national problem, and the U.S. Environmental Protection Agency is poised to release public health safeguards regarding coal ash. The costs of complying with these public health safeguards should be calculated into PSE's IRP.

PSE should also conduct a full and adequate accounting of the full range of costs associated with complying with air quality regulations such as potential SO2 non-attainment costs, compliance with the Regional Haze rule, and the new federal air toxics rules.

Montana has an abundance of clean and renewable energy sources that create good jobs for our state. These resources could also be valuable for Washington utilities' and ratepayers. For example, Montana's abundant wind energy resource would complement Washington's wind energy. This is because Montana's wind energy peaks in the winter when Washington's wind has slowed and has a lower capacity factor. This balancing capability could help utilities like PSE incorporate more wind into their portfolio, reduce integration costs, and improve grid reliability. These advantages all would help reduce costs to ratepayers.

I appreciate you taking my comments into consideration. Thank you for your time.

Phil Robison phil@mt.net 14 South Raleigh Helena, MT 59601 2013 AUG 12 PM 2:34

From: Sierra Club <information@sierraclub.org> on behalf of Mary Mullins

<marymum@mullinsmail.com>

**Sent:** Monday, August 12, 2013 1:38 PM

**To:** UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Mary Mullins 702 W Casino Rd # 103 Everett, WA 98204-1664 (425) 359-5070

From: Sierra Club <information@sierraclub.org> on behalf of Miguel Ramos

<mantecax@gmail.com>

Sent: Monday, August 12, 2013 1:38 PM

To: UTC DL Records Center

**Subject:** RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Miguel Ramos 4663 Fremont St Bellingham, WA 98229-2627

From: Sierra Club < inf

Sierra Club <information@sierraclub.org> on behalf of Michael Keith

<olywadude@gmail.com>

Sent: Monday, August 12, 2013 1:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Michael Keith 1908 Sycamore St SE Olympia, WA 98503-7007 (360) 491-8584

From:

Sierra Club <information@sierraclub.org> on behalf of Dave Russell <dave98033

@frontier.com>

Sent:

Monday, August 12, 2013 1:38 PM

To:

UTC DL Records Center

Subject:

Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am upset by the PSE plan for the Colstrip facility.

Carbon pricing will come, and will significantly effect future economics of plant operation. But more impossible that the decision is inconsistent with the aspirations of state law on greenhouse gas, and action taken to phase out coal-fired plants in Washington.

There are cleaner, safer, and less risky alternatives. Please insist on an honest evaluation that will give us an alternative to the environmental disaster that continued coal operation will bring.

Thank You,

Sincerely,

Dave Russell 4507 105th Ave NE Kirkland, WA 98033-7637 (425) 822-5744 2013 AUG 12 PF

From: Sierra Club <information@sierraclub.org> on behalf of Claudio Burdisso

<cdbcdb@gmail.com>

**Sent:** Monday, August 12, 2013 1:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-12)

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

Aug 12, 2013

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Claudio Burdisso 7586 Oat Coles Rd Everson, WA 98247-9542 (206) 497-9585

From: Sierra Club <information@sierraclub.org> on behalf of Teresa Adams <teadam22

@gmail.com>

**Sent:** Monday, August 12, 2013 1:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Teresa Adams 703 S 69th Ave Yakima, WA 98908-1809