

Northlake Unitarian Universalist Church
Green Sanctuary Team
Social Justice Ministry
308 4th Avenue South
Kirkland, WA 98033

Washington State Utilities and Transportation Commission

February 19, 2018

Comment Re:

- Puget Sound Energy's Electric Integrated Resource Plan (UE-160918)
- Puget Sound Energy's Natural Gas Integrated Resource Plan (UG-160919)

Dear Utilities and Transportation Commission:

We write to you as concerned members of the greater Puget Sound community.

We have reviewed the 2017 Puget Sound Energy (PSE) Integrated Resource Plan (IRP) (<https://www.utc.wa.gov/regulatedIndustries/utilities/energy/Pages/resourcePlansByCompany.aspx>), as well as 1) the January 2018 "Gas Fact Sheet" prepared by the Sierra Club, 2) the Synapse Energy Economics, Inc. report dated January 19, 2018, and 3) the 2016 PSE Greenhouse Gas (GHG) Inventory, prepared Nov. 2017 (https://pse.com/aboutpse/Environment/Documents/GHG_Inventory_2016.pdf). In addition to echoing the concerns in the Synapse report—particularly the irregularities in PSE's calculations which may be artificially exaggerating the cost of wind and solar power—we wish to call the Commission's attention to the issue of total lifecycle impacts of natural gas use.

We are pragmatic enough to recognize that, even if PSE commits to obtaining all of its electricity from clean sources, PSE will remain a *natural gas provider* for home heating and other purposes. Thus, there is no escaping the need for more stringent accounting and regulation of natural gas impacts.

We have two requests:

1) Just as the Puget Sound Clean Air Agency will be conducting an in-depth analysis of the total GHG emissions from the proposed Tacoma liquefied natural gas plant (see the Candace Rudd article in *The News Tribune*, Jan. 24, 2018, (<http://www.thenewstribune.com/news/local/article196502779.html>), PSE needs to conduct an in-depth analysis of its *total* emissions for natural gas provided to its customers, including emissions from methane leakage from third-party providers. We find the hand waving on page 12 of the 2016 GHG inventory (section 4.2.3 "these emissions are thought to be minor, more uncertain,

and further from PSE's control") to be completely unacceptable. As a major purchaser and provider of natural gas, PSE cannot disclaim responsibility for the behavior of its providers.

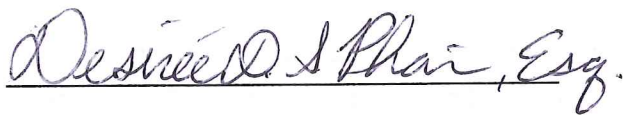
The emissions are "uncertain" because PSE has not made sufficient efforts to demand measurement, and that which is not measured cannot be properly regulated. We seek a full accounting of methane leakage and other upstream emissions as *step one*, with a plan for reducing those emissions as an anticipated step two in future IRPs.

2) As PSE builds pipelines, storage facilities, or other capital projects necessary for delivering natural gas to customers, we expect PSE to interact respectfully with our local tribes. Treating the Puyallup concerns as though they are merely "not in my backyard" common complaints is disgraceful behavior. We expect PSE to negotiate with the Puyallup in good faith, to respect their demands regarding treatment of their land, and to pursue alternative arrangements whenever the Puyallup do not consent to a land use decision that impacts their safety or treaty rights. While we all appreciate PSE's efforts to serve as a cost-effective provider, running over our indigenous neighbors will never become a justified means to that end.

As concerns the Utilities and Transportation Commission, we ask that you provide the structure necessary to make our two requests a reality. Politely asking a private firm to voluntarily spend resources measuring its emissions in more detail or improving its relationships with local tribes will not effectuate change. As the local regulator, we hope that you will make mandatory the type of in-depth emissions accounting and good faith land use negotiating that we rate payers expect from PSE.

Thank you for your time and consideration.

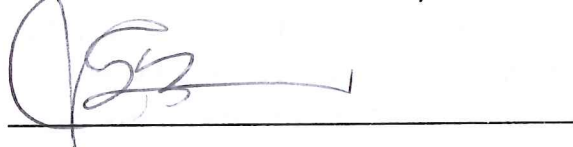
Sincerely,



Desiree Phair, Esq. - Green Sanctuary Team



Howard Harrison - Green Sanctuary Team Chair



Judith Shattuck - Social Justice Chair