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Subject: Comments on PSE IRP
Date: Sunday, February 18, 2018 9:55:31 PM

February 18, 2018

Washington State Utilities and Transportation Commission
Submitted by email to records@utc.wa.gov
Comments on Docket Numbers UE-160918 and UE-160919

Dear Commissioners:

Thank you for your service to the citizens of Washington as you consider the Integrated Resource Plan (IRP) for Puget Sound Energy (PSE). For reasons described below, we urge you to reject the 2017 IRP submitted by Puget Sound Energy.

As members of the Religious Society of Friends (Quakers), we considered both technical requirements and the testimonies of our faith. Stewardship of the earth for future generations is a responsibility all people share. An IRP that sincerely attempts to care for the environment would have a more aggressive action plan than the plan submitted by PSE. As the effects of climate change spread throughout the world, it is forecast that communities with fewer resources will disproportionately suffer; this is how the seeds of war are sown. Spiritual integrity requires that we accept responsibility for our actions and deal fairly with those we impact. LNG plants located adjacent to the lands of Native People are contrary to this principal. A plan that impacts Native People without the legally required "meaningful consultation" continues a long US history of treaty violations and placing environmental threats on or very near Native land. This is morally and legally unacceptable.

The Washington Administrative Code (WAC) requires that any IRP consider both "...the cost of risks associated with environmental effects including emissions of carbon dioxide..." and "... public policies regarding resource preference adopted by Washington state..."

Based on what we know about climate change today, only a plan that foresees no use of natural gas and coal infrastructure by 2025 takes into consideration the true costs of environmental effects, as required by the WAC. The costs considered must be more than direct costs to PSE's rate payers. They must include the mammoth and crippling indirect costs, such as those from rising sea levels, severe storms, prolonged droughts and safety risks due to the transport of fuels. Taking the true costs into account means formulating a plan that uses no natural gas nor coal for electricity generation, processing, or transmission by the end of the planning horizon.

As opposed to following the WAC, PSE's IRP contemplates taking a wait-and-see approach to implementation of climate policy. This is unnecessary and short sighted. Public policy in Washington state is not moving toward a fossil-based energy future. Rather, a measure setting more aggressive greenhouse gas emission targets recently passed the House and is now being considered by the Senate. PSE is ignoring not only the WAC, but an important responsibility to the public that both utilities and regulators share.

In the executive summary, PSE's IRP states: "PSE recognizes the importance of mitigating climate change". Given the gravity of the catastrophic effects of climate change, this statement rings hollow because the IRP does not include a rapid and complete phase-out of fossil fuel infrastructure. Please reject PSE's IRP as submitted.

We recognize that a multidimensional analysis of a complicated IRP is a difficult task and once again we thank you for your work.

In peace,

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