

From: [Kyle Taylor Lucas](#)
To: [ATG WWW E-mail Public Counsel](#)
Subject: Fw: Formal Written Comment in Response to Petition of PUGET SOUND ENERGY, INC Docket UG-151663
Date: Wednesday, October 19, 2016 4:10:18 PM
Attachments: [Kyle Taylor Lucas - UTC Formal Comment RE Puget Sound Energy Inc - Docket UG-151663.docx](#)
Importance: High

Dear Public Counsel, ATG:

The UTC , in reply to my submitted public comment, seemed to indicate you are aggregating public comment, so I am forwarding my comments to you for inclusion.

Thank you for helping us!

Sincerely,
Kyle

Kyle Taylor Lucas
(360) 464-0085

<https://www.linkedin.com/in/kyletaylorlucas>

<https://twitter.com/KyleTaylorLucas>

"I'm just a human being trying to make it in a world that is very rapidly losing its understanding of being human." -- (John Trudell)

From: Kyle Taylor Lucas <KyleTaylorLucas@msn.com>
Sent: Wednesday, October 19, 2016 3:08 PM
To: comments@utc.wa.gov; dmoss@utc.wa.gov
Subject: Formal Written Comment in Response to Petition of PUGET SOUND ENERGY, INC Docket UG-151663

Dear Commissioners and Administrative Judge Moss:

Please accept my formal comments inserted below and on the attached document in response to: Puget Sound Energy - Docket UG-151663

Kyle Taylor Lucas

October 19, 2016

Washington State Utilities and Transportation Commission
and Administrative Judge Dennis Moss
1300 Evergreen Park Drive SW
Olympia, WA 98502

RE: Petition of PUGET SOUND ENERGY, INC., for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc., and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services, Docket UG-151663

Dear Commissioners David Danner, Philip Jones, and Ann Rendahl, and Administrative Judge Dennis Moss:

I write as a residential customer of Puget Sound Energy (PSE) to urge your denial of PSE's request to remove the "ring fencing" protecting consumers from PSE's plan to build an 8 million-gallon LNG liquification and storage facility at the Port of Tacoma.

As a residential PSE customer, I strongly object to being forced to provide the financial guarantee for and to subsidize a risky, polluting, and dangerous scheme.

Puget Sound Energy spent millions opposing my local public power effort a few years ago, so we remain hostage to a foreign private interest controlling our rates and policies. You are our only hope for fairness.

As you know, when the Australian Macquarie Group purchased PSE in 2008, the Washington UTC required "ring fencing" provisions to be added to the sale to protect residential customers from financial risk. Now PSE seeks to dismantle that ring fencing residential protection so that a shell company it created called Puget LNG can run the proposed Port of Tacoma LNG business and charge unregulated rates for natural gas.

Clearly, PSE seeks to force residential customers to subsidize and assume the risk for its LNG scheme. The proposed LNG facility offers no tangible benefit to residential customers.

Consider the following:

- Peak shaving is a tiny percent of the total project (3.5% to 7%, depending on whether one considers PSE claims or the figures provided by ECO Northwest's Economic Impact Analysis). That means that the bulk of this project (93% to 96.5%) is unregulated business. Utility ratepayers should not assume any risk for a venture that is essentially unregulated business without clear public benefit.
- The need for additional peak shaving capacity is doubtful, as PSE currently stores 47 billion cubic feet of natural gas at Jackson Prairie in Chehalis.
- Utility ratepayers should have a place at the table in the mediations between PSE, Northwest Industrial Gas Users, and Industrial Customers of Northwest Utilities. These mediation meetings have been neither public nor transparent. Public interests are not served.
- As you know, the UTC filed a complaint against PSE for violations of pipeline-safety regulations resulting in the 2004 natural gas explosion in Seattle's Greenwood neighborhood. PSE could face up to \$3.2 million in penalties. Although this was a relatively small leak, it injured nine firefighters and damaged two buildings. PSE cannot

be trusted with an 8 million gallon LNG facility connected to hundreds of miles of pipeline.

Most of the nearly 2 million PSE customers in the Washington State have no other choice of utility and should not have to support a foreign-owned, for-profit fossil fuel business that is asking for a \$49 million public subsidy.

The amount of this public support—in the form of subsidy and underwriting of risk— was made clear in a May 18, 2016 response brief by Public Counsel from the WA Attorney General’s Office: “PSE (effectively Puget Energy) now states that it will not enter into this new risky business venture with Puget LNG unless PSE ratepayers share in the risks and unless Puget LNG receives a \$49 million subsidy (share of the benefits) from PSE ratepayers.”

I am grateful for the advocacy of the WA Attorney General’s Office in the matter of Docket UG-151663, since as a residential customer I am not allowed to participate in the ongoing mediation even though it is likely to affect me directly. During this mediation process, I respectfully ask that you keep in mind the UTC’s own mission statement: “to protect consumers ensuring that utility and transportation services are fairly priced, available, reliable and safe.”

I ask you to honor your commitment to protect Washington State utility customers from predatory schemes such as those proposed by PSE/the Macquarie Group by denying PSE’s request to remove the “ring fencing” provisions. I also ask that you deny any future scheme that PSE may propose that would involve residential customers either to subsidize or assume the risk for PSE’s speculative, private business venture.

This issue is critically important to me and my family and neighbors. I will continue to follow it closely and to speak out about it as widely and as publicly as I am able.

Thank you for your consideration.

Sincerely,

Kyle Taylor Lucas
Tumwater, WA