

**From:** [David Kershner](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** PSE IRP comment regarding docket numbers UE-160918 and UG-160919  
**Date:** Thursday, February 22, 2018 8:16:33 AM

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Dear WUTC Commissioners,

Although PSE has made progress toward a renewable energy future with its green energy and energy efficiency incentive programs, the utility can do more, and needs to do more to transition away from coal and gas to renewable energy. I urge the WUTC to reject PSE's current energy plan unless it is revised to phase out all the Colstrip units by 2025 and eliminate plans for additional fracked gas infrastructure, including the liquified natural gas terminal in Tacoma. Washington State needs to accelerate the transition away from coal, oil, gas, and nuclear power.

As no doubt many other commenters have emphasized, PSE's own analysis on Page 6-52 of the PSE 2017 IRP shows that retiring Colstrip generation capacity by 2025 could save \$149 million if carbon pricing is put in place in Washington State. Given that survey data suggests that the majority of Americans are willing to pay as much as 14 percent more for electricity to combat climate change and further given that several jurisdictions in PSE's service area have called on PSE to retire Colstrip Units 3 and 4 by 2025, it seems only prudent that the WUTC require this revision to the plan. For survey data on placing a price on carbon, please see: <http://iopscience.iop.org/article/10.1088/1748-9326/aa822a>

Also, PSE needs to stop investing in new gas infrastructure for both environmental and economic reasons. As others have pointed out, gas-fired power plants are financially risky, especially given that Washington voters are likely to vote in favor of carbon pricing in the near future even if the Legislature does not. California invested heavily in gas infrastructure and now has plants sitting idle, while the cost of renewable energy is coming down rapidly. With battery technology improving and gas-fired plants closing and proposed plants being cancelled in California and Oregon, PSE needs to look harder at renewable energy alternatives and energy efficiency.

If Washington State is going to meet the goals of the Paris climate agreement, we need to transition more rapidly to 100 percent renewable electricity. And it can be done. Our state is closer to a 100 percent renewable electricity future than most states in the nation. For example, the State of Maryland generated 40 percent of its energy from nuclear power in 2016 and only about 7 percent from hydropower and utility-scale solar, yet a study by the Institute for Energy and Environmental Research in Maryland indicates that achieving a 100 percent renewable electricity system in that state by 2035 is technically and economically feasible. The report finds that a "100 Percent Renewable scenario" would result in a ratepayer impact of approximately \$2 per month/household in 2035. When factoring in the social cost of carbon emissions, the cumulative 17 year cost savings to the State of Maryland of transitioning to 100 percent renewable electricity is in the billions of dollars. The report concludes that a 100 Percent Renewable scenario yields thousands of additional jobs versus a "Business as Usual" scenario. Technical and fiscal reports are available at the link below: <https://ieer.org/resource/economic-issues/100-renewable-electricity-supply-maryland/>

Please use your authority to require PSE to retire the Colstrip units by 2025 and scrap plans for new fracked gas infrastructure. Washington State needs to accelerate the transition to a

renewable energy future and meet our obligations to combat the threat of climate change. We can't afford to do otherwise.

Respectfully,

David W. Kershner  
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