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**To:** [UTC DL Records Center](#)  
**Subject:** COMMENTS ON UE-160918 AND UG-160919: ORAL TESTIMONY NOTING IRP DEFICIENCIES THAT NEED TO BE ADDRESSED IN 2017 SUPPLEMENT  
**Date:** Thursday, February 22, 2018 10:41:12 AM  
**Attachments:** [COMMENTS ON UE-160918 AND UG-160919 - ORAL TESTIMONY NOTING IRP DEFICIENCIES THAT NEED TO BE ADDRESSED IN 2017 SUPPLEMENT.doc](#)

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Please find in the attached Word file additional comments from me on Docket number UE-160918 AND UG-160919.

Robert S. Briggs

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Thursday, February 22, 2018

Dear UTC Commissioners:

Subject: COMMENTS ON UE-160918 AND UG-160919: ORAL TESTIMONY NOTING IRP DEFICIENCIES THAT NEED TO BE ADDRESSED IN 2017 SUPPLEMENT

*[Note: I presented an abbreviated version of these comments late in the hearing in Renton on Wednesday, February 21 when testifiers were limited to one minute.]*

Thank you for this opportunity to speak. My name is Rob Briggs. I'm a Vashon resident, a PSE ratepayer, and a retired research scientist with Battelle, Pacific Northwest National Laboratory.

Thirty years ago, the top climate scientist at the lab would frequently state that "if we allow atmospheric CO<sub>2</sub> to double from pre-industrial levels, we will be living on a different planet. Changes will be so profound we will not recognize the place."<sup>1</sup>

PSE 2017 IRP is a roadmap to just that place that none of us want to go. It seems wildly out of touch with both scientific and political realities.

I don't mean to impugn the professionalism or integrity of the PSE employees who prepared this report. I'm sure they would prefer to be building the showcase green utility portrayed in PSE's ads.

I'll restrict my technical comments to just the natural gas sections:

1. The IRP shows direct gas sales growing by between 20% and 40% over the coming 20 years. But Washington state policy calls for CO<sub>2</sub>equivalent emissions to be reduced by more than 40% in that same time period.<sup>2</sup>
2. The IRP totally ignores upstream methane emissions and fails even to account for PSE's own methane losses in distribution.
3. PSE needs to be using a CO<sub>2</sub>equivalent basis (which includes fugitive methane emissions) for its cost-of-carbon analyses to meet statutory requirements for assessing "the cost of risks associated with environmental effects."<sup>3</sup>
4. Once these policy and analytical disconnects are addressed, analyses will show that no new natural gas infrastructure is economic or needed. The task ahead for PSE is

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<sup>1</sup> Dr. Gerald Stokes, among many other roles, was founding director of the Joint Global Change Research Institute, a collaborative effort between the Pacific NW National Laboratory (PNNL) and the University of Maryland.

<sup>2</sup> Recommendations from Washington State Department of Ecology call for 40 percent reductions below 1990 levels by 2035 to be compliant with commitments under the Paris Agreement. This commitment has been reinforced by Washington's participation in the United States Climate Alliance. As of 2016, the state was 6 million metric tons of CO<sub>2</sub>e, or 6.8 percent, higher than its 1990 level. Source: Sarah Rees, "Washington Greenhouse Gas Emission Reduction Limits," Washington State Department of Ecology, Publication no. 16-01-010, December 2016. Available here: <https://fortress.wa.gov/ecy/publications/SummaryPages/1601010.html>.

<sup>3</sup> Washington Administrative Code 480-90-238, Integrated resource planning. Specifically (2) (b): "At a minimum, this analysis must consider...public policies regarding resource preference adopted by Washington state or the federal government, the cost of risks associated with environmental effects including emissions of carbon dioxide..." Available here: <http://apps.leg.wa.gov/WAC/default.aspx?cite=480-90-238>.

an orderly phase-out of gas and an orderly build-out of renewable generation to meet customers' energy needs.

I ask the Commission to find this IRP in substantial noncompliance with WAC 480-90-238. It is unresponsive to requirements related to public policies and environmental effects, and these deficiencies need to be addressed in a 2017 Supplement. Time is running out.

Thank you.

Respectfully submitted,

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Retired Senior Research Scientist, PNNL

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