

March 5, 2021

Washington Utilities and Transportation Commission

Re: Puget Sound Energy's 20-year Draft Integrated Resource Plan for electricity and gas,  
Docket #'s UE-200304 (electric) and UG-200305 (natural gas)

Dear Utilities and Transportation Commissioners,

Thank you for receiving Anne's comments at the hearing last week and for accepting our written comments on Puget Sound Energy's (PSE) 20 year IR Plan for electricity and gas. We believe that your decision made from this hearing will be critical in determining the future emissions and health of our region, given that what we suspected and predicted 4 years ago as the dire scenario of climate change, has come to more full fruition with no escape for any species.

In fact, the UN Climate Change group just [published](#) "a synthesis of climate action ambition as contained in countries' new or updated Nationally Determined Contributions (NDCs), indicating that nations must redouble their climate efforts if they are to reach the Paris Agreement's goal of limiting global temperature rise by 2C—ideally 1.5C—by the end of the century."

Closer to home, [Posted from the UW News](#), Feb 9 2021:

"The University of Washington study finds that emissions reductions about 80% more ambitious than those in the Paris Agreement, or an average of 1.8% drop in emissions per year rather than 1% per year, would be enough to stay within 2 degrees. The [results](#) were published Feb. 9 in Nature's open-access journal [Communications Earth & Environment](#)."

Considering this point in time, we are writing to ask the Utilities and Transportation Commission to not allow Puget Sound Energy (PSE) to build new gas power plants for their long-range electricity plan and to reduce their use of gas as quickly and completely as possible. Our new state law which establishes science-based fossil fuel reductions on the UN IPCC recommendations, call for 95% reductions by 2050 and 70% reductions by 2040. Yet PSE's long-range plan for its gas utility shows an increase in gas infrastructure growth for the next 20 years. Sightline Institute has called out a [mismatch](#) between state emissions goals and PSE's growth plans, noting that with Washington's natural gas use nearly [one-quarter](#) of the state's energy-related carbon emissions, a drastic reduction in our entire use of gas must be undertaken now.

By 2030, as the IPCC has stated, our people-created emissions must be reduced to BELOW 2010 levels in order to not overshoot the 1.5°C rise currently expected. This translates to a 45% reduction. It is not possible to build any new fossil fuel infrastructure nor expand what is already in place, if we wish to meet this reduction goal. As natural gas, or more accurately, non-renewable fossil fuel gas, is made up of approximately 90% of methane, known to be the primary cause of our worst CO2 emissions, mining and transporting this gas is certainly adding to our rising emissions rather than the reduction as needed. In fact, a just-released report through Eos called, [The Surprising Source of Greenhouse Gas Emissions](#), which studied the full set of emissions from extraction to end use of coal, oil, and gas infrastructure, revealed that oil and gas took up equal places in sources of emissions from start to finish, far outweighing coal.

According to a Reuters article posted 8/18/2020: “Climate scientists say that rising production of natural gas is emerging as one of the biggest drivers of climate change, and that plans for industry expansion could hobble efforts to stabilize the Earth’s climate.”

Specifically as regards energy production, Washington State’s Clean Energy Transformation Act (CETA) requires utilities to be 80% carbon free by 2030 and 100% by 2045. Avoiding compliance by not making investments in energy efficiency and true renewable energy production, such as wind and solar, and calling the CETA rule too expensive to implement, allows PSE to keep their costs “down”, funneling their dollars to executive salaries of millions and to investors for a high and consistent rate of return. And when 2040 is reached, PSE will be gone, leaving behind “stranded assets”, with the ultimate damage done to our short and long-term health from the poisons and carbon emitted from their gas plants and the deteriorating infrastructure.

PSE also needs to follow State recommendations that identify moving buildings from gas to electricity usage as a key strategy for climate protection. They need to commit to building no new non-renewable gas pipelines or infrastructure, just as with our State’s goals and actions. These commitments would include no new gas lines for buildings or homes, no expansion of existing pipelines and especially no LNG facilities.

As if the future health of people and planet were not enough incentive to change, the immediate transmission of gas and its usage is also dangerous and harmful.

Just last month, on Feb 12<sup>th</sup>, a report made national news that a PSE gas leak presumed caused by contractors hitting a gas line while working in the KCIA parking lot, created the need for evacuations and interruption of normal business at the airport for several hours.

Besides gas leaks and explosions, sometimes turned deadly, studies have linked indoor air quality from gas appliances to significant increases in childhood asthma rates and other respiratory problems. These significant health problems are not seen from the use and transmission of true renewable energy sources.

And when the make-up of the gas in our pipelines feeding our energy plants includes at least some coming from fractured processing, which is known to poison the surrounding groundwater, the harm starts with the mining and production of gas.

Above all, emissions need to be reduced first and foremost to benefit surrounding communities to fossil fuel infrastructure. It is imperative, if only for these communities alone, that reductions bring us below zero emissions, as quickly as possible. The suffering from health issues in our region and susceptibility to diseases like Covid-19, can be lessened with mitigation to climate change, which is accomplished by severe curtailment of emissions. These communities are overwhelmingly communities of color and low-income communities. It is not only the morally correct thing to do for racial and economic justice, but also for our shared natural environment and the public health of our society.

PSE does not adequately serve the State of Washington, nor its customers. It is a corporation, run solely for the largest short term monetary benefit for its investors and executives, who are neither Washington residents nor rate payers. While PSE could invest in renewables and be on the way to a full portfolio of non-fossil fuel energy, which has been proven to be financially viable here and worldwide, they are not doing so. Even while PSE avoids economic and environmental responsibilities to its captive consumers, electric coops are investing in sustainable ventures like [battery storage](#), because they are serving their customers' and hence their own, best short and long term needs.

Puget Sound Energy is shirking its duties as a utility and as a corporate citizen; instead presenting a 20 year plan to continue its damage as a cause of climate change. They are not addressing, nor planning to address in their limited range outlook, the real needs of their customers and of the residents of our State.

Please do not allow PSE to irresponsibly build new gas power plants and infrastructure for the next 20 years, and instead require them to reduce their use of gas for both their short and long-range energy requirements. Additionally, please require PSE to increase their sustainable electrical power generation and improve their electrical infrastructure to meet Washington's responsibilities and legal requirements towards eliminating our climate change impacts.

Thank you for your attention to the above comments and for serving our region to bring the best energy choices to all of our residents, now and for the future.

Sincerely,

Anne Kroeker and Richard Leeds

Des Moines, WA

Dear Utilities and Transportation Commissioners,

Thank you for receiving my comments on Puget Sound Energy's (PSE) 20 year IR Plan for electricity and gas. I believe that your decision made from this hearing will be momentous in determining the future emissions and health of our region, given that what we suspected and predicted 4 years ago as the dire scenario of climate change, has come to more full fruition and now cannot be looked away from.

In fact, 20 years is not a long enough plan to consider; it should be at least 30 years, possibly 50. And as a critical next point, where will PSE's emissions be in 9 years, when as the UN IPCC has stated, by 2030, our people-created emissions must be reduced to BELOW 2010 levels in order to not overshoot the 1.5°C rise currently expected. This translates to a 45% reduction. It is not possible to build any new fossil fuel infrastructure nor expand what is already in place, if we wish to meet this reduction goal. As natural gas, or more accurately, non-renewable fossil fuel gas, is made up of approximately 90% of methane, known to be the primary cause of our worst CO2 emissions, mining this gas is certainly adding to our rising emissions rather than the reduction as needed. And when the make-up of the gas in our pipelines feeding our energy plants, is known to have at least some fractured production, and known to poison the surrounding groundwater, the lose-lose situation becomes even more dire.

In fact, a recent University of Washington study finds that emissions reductions about 80% more ambitious than those in the Paris Agreement, or an average of 1.8% drop in emissions per year rather than 1% per year, is needed to stay within 2 degrees.

Besides polluting air and ground, gas transmission and usage is not safe!

Just last week, on Feb 12<sup>th</sup>, a report made national news that a PSE gas leak presumed caused by contractors hitting a gas line while working in the KCIA parking lot, creating the need for evacuations and interruption of normal business for the airport for several hours.

Besides gas leaks and explosions, sometimes turned deadly, studies have linked indoor air quality from gas appliances to significant increases in childhood asthma rates and other respiratory problems. These significant health problems are not seen from the use and transmission of true renewable energy sources.

Above all, emissions need to be reduced first and foremost for surrounding communities. It is imperative even if only for these communities alone, that reductions bring us below zero emissions. Reduction of suffering in our region and susceptibility to diseases like Covid-19 is achieved through mitigation to climate change, which is accomplished by severe reduction of emissions. These communities are overwhelmingly communities of color and low-income communities. It is not only the morally correct thing to do for racial and economic justice, but also for our shared natural environment and the public health of our society.

PSE simply is not now, nor planning to in its 20 year plan, to address the real needs of its customers nor of the residents of our State, much less complying with Washington State's climate goals which require a 70% reduction in carbon emissions by 2040.

Please do not allow Puget Sound Energy to build new gas power plants for their long-range electricity plan and to reduce their use of gas for the long-range gas plan.