

Comments by James Adcock on Docket U-210553

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Comments Related to Decarbonization Pathways, Docket U-210553

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Comments by James Adcock, Electrical Engineer, MIT, decades-long Stakeholder in trying to get Utilities in Washington State to reduce Carbon Pollution.

OK, I'll bite since no one else seems to be doing so – let me be the naïve little boy who points and exclaims “But the Emperor has no clothes!”

There is ONE sensible Decarbonization Pathway which actually “works” – and we all know what it is. It comes in two parts:

Part One: Stop Burning Coal.

Part Two: Stop Burning Natural Gas.

So, the way for Electrical Utilities to Decarbonize is as follows:

1) Stop Burning Coal.

2) Stop Burning Natural Gas.

Part two in turn has two subparts:

2a) Don't Let Electrical Utilities Drag Their Feet by building new Natural Gas Generating Plants while pretending that those new Natural Gas Generating Plants are going to be burning “Renewable Diesel” – because they won't – once built they will continue to burn more Natural Gas for decades. Do Not Let Electrical Utilities build these new Generating Plants!

2b) Don't Let Electrical Utilities Drag Their Feet by building new Natural Gas Generating Plants while pretending that those new Natural Gas Generating Plants are going to be burning “Renewable Hydrogen” – because they won't – once built they will continue to burn more Natural Gas for decades. Do Not Let Electrical Utilities build these new Generating Plants!

What works instead? Electrical Utilities need to build tons of Wind Power, Solar Power, and

Energy Storage including Pumped Hydro and Battery Storage. And we all need to invest in Efficiency. And Electrical Utilities needs to price based on Time of Day and Time of Use so that Ratepayers will naturally work with the utility, not against it, to achieve these goals.

Now the Next One is Harder to Understand: How do we get Natural Gas Utilities to Decarbonize?

The answers is simple but a bit unpleasant to the Utility Owners' -- Very Simply Natural Gas Utilities must be phased out and shut down. We know how to do this. It is similar to phasing out and shutting down Coal Power Plants and Coal Mines. Just Stop Doing It. Shut it down, tear it down, and sell all the little metal parts for scrap metal.

If Washington State Regulators and Utilities are not willing to do this, then Cities will – we are already seeing this begin to happen. A Utility exists to serve the public in a positive way. When a Utility instead tries to continue to exist to serve the public in a negative way – to simply maintain their monopoly power against the best interests of human society then it is time to shut them down. Since the time of the Romans human society has recognized the right of the government to simply shut down businesses which are noxious air polluters. Now it is time for Natural Gas utilities to follow the same natural path – Just Shut Them Down. We know that Natural Gas utilities represent a net-negative to human society because the gas prices they earn are smaller than the GHG pollution damages they cause – using EPA's new updated Social Cost of Carbon numbers. Just Shut Them Down.

Now if Owners own both Electrical Utilities and Gas Utilities in the same market this is not very painful: Shutting Down Natural Gas means an increase in the use of [renewable] electricity, so the loss on one side is offset by a gain on the other. But when they have a market that is just Natural Gas then it is a bit more painful for them. But So What? The Buggy Whip manufacturer does not have a God Given right for Government to continue to protect their bad business choices and investments. Do not use Government Regulatory Powers to simply give the Buggy Whip manufacturer an excuse to put a thin coating of green paint on their Buggy Whips!

And that is exactly what “Renewable Hydrogen” is – a thin coating of green paint on their Buggy Whips, to give them an excuse to continue to drag their feet and to continue to operate their utility monopolies in ways which are hugely destructive to human society.

Let's go over this again. What happens when you take 3 units of Renewable Electrical Energy, convert that to “Renewable Hydrogen”, and then burn that in Natural Gas Power Plants? The answer is that you get 1 unit of power back out. Two thirds of the renewable power has been wasted so that the Buggy Whip manufacturer can put a thin coating of green paint on their Buggy Whips! This approach – “Renewable Hydrogen” – is suicidal to the continued existence of the human race on this planet.

Furthermore, to the extent that any of this Very Expensive “Renewable Hydrogen” gets made

there are better, more profitable, industrial uses for it – NOT just turning around and burning it up again in Natural Gas Turbines!

The same is true of Natural Gas Utilities: Trying to put a little bit of green paint on the Buggy Whips by mixing in a bit of Renewable Hydrogen into the Natural Gas mixture is human society suicide. First of all, the increased embrittlement of pipelines means that you are going to be blowing up more people and businesses. Secondly, it is too expensive. Third, there is not enough. Fourth, there are better uses for it. So then, what is the answer? Simple: Just Shut Down the Natural Gas Utilities.

In summary, do you want to just continue to play fun and games? Or do you actually want to try to save the human race and the planet? Because that is the choice.

The time for mickey mouse fun and games is OVER!

Sincerely,

James Adcock, Electrical Engineer, MIT