

**WASHINGTON
ENVIRONMENTAL
COUNCIL**

UE-141170
UG-141169
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March 3, 2016

Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250
Docket #UG-141169 and #UE-141170

Dear Chairman Danner and Commission Members,

I am writing to comment on Puget Sound Energy's (PSE) Integrated Resource Plan (IRP) that is currently being reviewed by your Commission.

Washington Environmental Council (WEC) has a long-term commitment to advance state policy to reduce carbon emissions, use energy efficiently, transition to clean energy, and set limits on global warming pollution.

We request that you require PSE to phase out the use of carbon intensive Colstrip coal power in its latest IRP. This direction would be consistent with both Washington statute which limits our state carbon emissions over time, including emissions from electricity produced out of state, and the UTC's direction from the Washington Administrative Code.

As you know, only about 15% of Washington's electric power is coal generated - but coal contributes over 80% of the carbon emissions from this sector, and 17% of Washington State's carbon emissions overall. To meet our statutory obligations to reduce carbon emissions outlined in RCW 70.235.020 we need to use significantly less coal, and yet the IRP presented by PSE continues to rely on imported coal power in a way that will make it almost impossible to meet these limits.

Additionally, changes are being discussed at both at the state and federal level that would impact pollution produced at coal power plants. By way of ballot measure, legislation, or regulation, numerous avenues are currently being pursued to establish an economy-wide policy in Washington that would account for the cost of carbon. Moreover, under the Obama Administration, the Environmental Protection Agency has promulgated new rules that will dramatically impact the allowed carbon emissions from existing power plants. These new policies may mean that continued investment in Colstrip and other coal powered plants will quickly become more, and perhaps prohibitively, expensive.

Washington Administrative Code (480-100-238 subsection (2)(b)) directs the UTC to consider that the lowest reasonable cost scenarios include the cost of risks associated with environmental effects explicitly including emissions of carbon dioxide. Based on this directive and current and planned federal and state policy, we believe that PSE's decision not to include the true cost of carbon in their IRP will leave both the utility and its customers vulnerable for additional costs and risks moving forward.

We are concerned that PSE continues to invest in an old, out-of-state coal plant when there are cleaner, more sustainable alternatives available here in Washington State. These alternatives could mean not only fewer carbon emissions and healthier air for the Northwest, but also significant numbers of new jobs for Washington. As one of America's leading utility-developers of renewable energy, PSE is well positioned to transition off coal and lead on producing and supplying green power to their customer base.

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Washington Environmental Council and Puget Sound Energy share a constructive working relationship, and we appreciate the investments PSE has made in renewable energy, energy efficiency, and encouraging stewardship and environmental responsibility among their customer base. We look forward to ongoing work together to make Washington State a leader in renewable energy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sasha Pollack', written in a cursive style.

Sasha Pollack
Climate and Clean Energy Campaign Director
Washington Environmental Council