

Huey, Lorilyn (UTC)

From: Richard Lauckhart <lauckjr@hotmail.com>
Sent: Sunday, April 17, 2022 9:03 AM
To: Public Involvement (UTC)
Cc: Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG)
Subject: RE: UE - 200304...PSE Integrated Resource Plan

UE-200304

External Email

Dear WUTC-

My name is Richard Lauckhart. I am an energy consultant and former VP at Puget Power.

Your website says proceeding UE-200304 is still "open". There has been no "Acknowledgement Letter" issued in UE-200304.

That being the case, I assume I can still provide comment.

My comments address two matters in the IRP as follows:

1. The WUTC Acknowledgement Letter dated May 7, 2018 in Docket UE-160918 stated:
"WAC 480-100-238(3)(d) requires an integrated resource plan to include "[a]n assessment of transmission system capability and reliability, to the extent such information can be provided consistent with applicable laws." The Company has an obligation to bring major transmission investments into the IRP for examination. The Company complied with the letter of the law in Chapter 8 where it provided a history of its Needs Assessment Reports. However, the Plan did not answer many questions that are needed for determining if the Company's conclusions are justified. For instance, it is still not clear if a joint utility analysis of all available transmission and potential interconnections in the Puget Sound region might solve the Energize Eastside reliability issues. Whether PSE has engaged in such analysis or discussions remains unclear and would have been better answered in the IRP."

Despite this statement, the foreign owners of PSE have clearly decided not to address Energize Eastside in the current IRP proceeding. Instead, the owners have asked you to find Energize Eastside to be prudent in their recently filed ratecase, UE-220066.

Over the last seven years I have investigated in depth the question of Need for Energize Eastside. I have provided extensive comment to you in Docket No. UE-220066 that Energize Eastside is not a prudent investment. **Given that the owners of PSE are not addressing these matters in the IRP, they have a lot of questions to answer in UE-220066.**

2. Don Marsh provided considerable comment in UE-200304 for the Sierra Club. His comments indicate that PSE should be moving faster to eliminate its natural gas fired supplies in an effort to help reduce greenhouse gas emissions. He suggests more use of batteries to provide reliable power instead of gas fired generation. His comments suffer in two major ways:

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a) Batteries have a 4-hour storage capability from fully charged to fully discharged. They cannot provide reliable power in the winter peak situations when there is no sun. And even though there is sun during the summer peaks, there are still nighttime loads that need to be served. Batteries cannot provide power during all the nighttime hours in the summer.

b) There is 97,000 MW of gas fired resource in the WECC. Eliminating 1,000 MW of PSE gas fired generation will not make a measurable reduction in WECC greenhouse gas emissions. Eliminating 1000 MW of PSE gas fired generation will have no measurable effect on global greenhouse emissions reductions. If PSE eliminates its own gas fired generation, PSE will be purchasing power in the market...which power will come from less efficient gas fired generators in WECC. **Requiring PSE ratepayers to pay for the Sierra Club plan provides no help to global warming and only penalizes PSE ratepayers.**

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