

UE-210795

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: Comments on Puget Sound Energy's 2021 Clean Energy Implementation Plan (CEIP - Docket UE-210795)

Dear Ms. Maxwell,

My name is Michael Cox and I live on Bainbridge Island.

I am co-chair of Bainbridge Island's Climate Change Advisory Committee (CCAC) and co-chair of Climate Action Bainbridge, which supports our community in making the transition to clean energy.

The CCAC developed the first ever Climate Action Plan for the City of Bainbridge Island, which was approved by the Bainbridge Island City Council in November 2020. As part of the Plan, we worked with the City to develop a greenhouse gas (GHG) emissions inventory. The inventory found that over 50 percent of our community's GHG emissions come from the production, distribution, and use of electricity provided by Puget Sound Energy (PSE). We also established ambitious targets to reduce our GHG emissions with our first target being to reduce those emissions by 25 percent compared to 2014 levels by 2025. We are working with the City and many local groups to implement the actions identified in the Climate Action Plan to help meet our ambitious goals.

But, to reach our goals, we need to green our energy supply and decrease our energy demand. PSE is central to both of those actions. It is imperative that the UTC ensures that PSE takes the steps needed so we can achieve our community goals.

### **1. CEIP Needs to Account for Climate Change Impacts**

A fundamental flaw in the analysis contained in the CEIP is that climate change impacts are not considered. This flaw means that PSE cannot accurately determine the periods when they most need energy and the best sources to supply that energy. For example, they must plan for increased peak summer demand when drought can alter hydro power availability and wind resources may be lower, but solar sources will be strong.

There are many sources of excellent information available from organizations such as the Climate Impact Group at the University of Washington, NOAA, and USGS that PSE could use to assist in their load forecasting.

PSE acknowledges this flaw in the CEIP. But it is difficult to evaluate their current CEIP without climate change being considered. It is ironic that reduction of climate change impacts is one of

the main “Customer Benefit Indicators” in the document, yet PSE does not include climate change impacts in its own analysis.

**2. CEIP Needs to Provide Greenhouse Gas (GHG) Emission Reductions**

The CEIP contains several customer benefit indicators including the reduction of GHG emissions. I assume that because this is an Implementation Plan, PSE is not required to provide the anticipated GHG emission reductions from its different investment options at this time. It would be good to provide that information sooner rather than later so the public can evaluate how the different elements contribute to reducing GHG emissions.

**3. Require PSE to Speed up its Programs to Reduce Electricity Demand for Cities and Customers**

Over more than a year, the Bainbridge Island Climate Change Advisory Committee and our City have been talking with PSE about several potential projects on Bainbridge Island to reduce our electricity demand. Examples include a distributed energy resources pilot, demand response program, energy efficiency program, and battery storage. While we appreciate the dialogue, we have seen very little to date in actual programming. I believe these programs are essential if we are to meet our Island’s, State’s, and nation’s climate goals. I urge the UTC to push PSE to make these programs available at a faster rate.

**4. Require PSE to Provide More Opportunities for Cities and Customers to Increase their Supply of Clean Energy**

The City of Bainbridge Island has been working with PSE on developing a community solar pilot on City land and many Island customers participate in the Green Direct program. While this is a great start, it is critical that PSE provides more opportunities for cities like Bainbridge Island and its customers to access PSE’s Community Solar programs and other programs such as Green Direct and Solar Choice programs. I urge the UTC to push PSE to offer more of these programs now. I believe this could enable PSE to avoid building a very expensive gas-powered plant, as specified in PSEs’ 2021 Integrated Resource Plan.

With our Clean Energy Transformation Act, the UTC is being asked to play a new role in regulating the elements that enable a rapid transition to clean energy in our state. I hope the agency can step up to leadership in this new role

Thank you for this opportunity to comment.

Michael Cox  
Climate Action Bainbridge, Climate Change Advisory Committee  
Bainbridge Island, WA