



March 1, 2022

Chair David W. Danner  
 Commissioner Jay Belasbas  
 Commissioner Ann Rendahl  
 c/o Amanda Maxwell, Executive Director and Secretary  
 Utilities and Transportation Commission  
 621 Woodland Square Loop SE  
 Lacey, WA 98503

State Of WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

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RE: Puget Sound Energy 2021 Clean Energy Implementation Plan, Docket UE-210795

Dear Chair Danner, Commissioner Belasbas and Commissioner Rendahl:

Thank you for the opportunity to comment on Puget Sound Energy’s (PSE) 2021 Clean Energy Implemental Plan (CEIP). We respectfully submit these comments as elected officials representing more than 2.25 million residents in King County and five cities, many of them PSE customers.

Confronting climate change and accelerating a transition to a clean energy economy is a priority for King County and our partner jurisdictions in the King County-Cities Climate Collaboration (K4C) representing over 80 percent of the county’s 2.25 million residents. Through the Growth Management Planning Council, 39 cities and King County have established shared, formal targets to reduce greenhouse gas emissions by at least 50 percent by 2030 and 95 percent by 2050. Members of the K4C have charted out specific commitments needed to meet these targets, including phasing out coal-fired electricity sources by 2025, limiting construction of new natural-gas fired electricity generation plants, and increasing renewable electricity use to 90 percent by 2030. King County’s 2020 Strategic Climate Action Plan lays out priority actions to reach these goals, informed by best available science, and substantial stakeholder input.

We thank PSE for its work in developing CEIP in compliance with the Clean Energy Transformation Act (CETA). We believe there are opportunities to strengthen the CEIP and accelerate the transition to clean energy supplies, which creates jobs, and protects the health and well-being of King County residents through cleaner air and lower carbon emissions. We raise these issues for consideration:

**Accelerate the transition:** We encourage PSE to move more rapidly to transition to clean energy supplies. PSE should increase the development or acquisition of clean energy generation

resources in early years in order to rapidly decrease its reliance on fossil fuel generation. All options for renewables, efficiency, storage, demand response, and grid modernization to meet supply needs should be exhausted before sourcing additional fossil fuel generation.

**Build for long term success:** PSE should ensure that the CEIP sets a foundation for successful compliance with the Clean Energy Transformation Act. In the 2021 Integrated Resource Plan (IRP), PSE proposes to develop 966MW of peaking capacity outside of the 2025 CEIP planning horizon, using biodiesel, although the IRP contains no analysis of the availability of biofuels supplies. For future CEIPs that include this resource, we suggest a fuller analysis that demonstrates that PSE can secure a consistent high-quality supply of biodiesel that enables it to operate these plants without reliance on natural gas. Without consistent supplies of biodiesel, the capacity will likely be met with natural gas – in direct opposition to the goals of the Clean Energy Transformation Act and King County’s shared emission reduction targets. PSE also needs to ensure that it is planning for the significant amounts of renewable capacity it needs in future years to comply with CETA. The 2021 IRP models a renewable capacity gap of 7.6 million MWh in 2030, underscoring the urgency with which PSE needs to develop and acquire renewable resources.

The K4C has a long history of collaboration with PSE. We have partnered with PSE on programs and initiatives that have increased investment in energy efficiency for our local government operations and for residents and businesses in our jurisdictions and subscribed to PSE’s Green Direct program to power facilities with new renewable resources in Washington State.

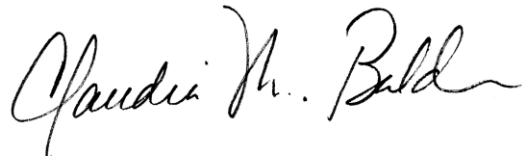
A resource plan that continues to rely on fossil-fuel based electricity generation is economically risky for ratepayers, as tightening supplies and increasing volatility of wholesale market prices could have serious financial impacts to budgets already strained by the impacts of the pandemic. We emphasize the need for additional renewable capacity that will reduce market reliance, while advancing commitments to reducing greenhouse emissions. We have an interest in the health, well-being, and economic opportunities of our residents, particularly those communities disproportionately impacted by climate change. We will continue to collaborate with the UTC and utilities achieve the CETA goals for clean energy supplies by 2045.

Thank you again for the opportunity to comment.

Sincerely,



Dow Constantine  
King County Executive



Claudia Balducci  
Chair, King County Council



Kristiana de Leon  
Councilmember, City of Black Diamond



Mary Lou Pauly  
Mayor, City of Issaquah



Penny Sweet  
Mayor, City of Kirkland



Salim Nice  
Mayor, City of Mercer Island



Angela Birney  
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