

Comments by James Adcock on UE-191023 The Need For a Third Control Point 2038

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Commenting party's name: James Adcock, Electrical Engineer

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Re: Docket UE-191023 James Adcock The Need For a Third Control Point 2038

What is a “Third Control Point” ? Two expressed “Control Points” exist in CETA: 2030 and 2045. These comments argue the need for a “Third Control Point” intermediate between these two dates – say 2038 – and why such a Third Control Point is needed.

It has been suggested, for example, that some utilities may want to implement NG Peakers with short-term useful lifetimes before early retirement. Such Peakers might be useful to ensure reliability, and to allow an alternative to rare high market prices, in the “Prior to 2038” timeframe, and then after 2038 as the utility implements a “Glide Path to 2045” these NG Peakers might be subject to early retirement, AKA “Stranded Assets.”

These [presumably] same utilities have argued recently that they should be subject (in regards to CEIPs) to 2030 requirements now [or maybe not even that!], but not to 2045 requirements – because that is more than 20 years in the future – “outside the planning horizon.” But such arguments would not allow UTC or stakeholders to review the “prudency” of these NG Peakers (for example) since they would outlive the 2030 Control Point, but presumably die somehow “magically” and without meaningful review, prior to the 2045 Control Point. In short, if one accepted the utilities’ position then the issues of “How Long Will These NG Peakers Last, How Will They Be Retired, and Will They Become ‘Stranded Assets’” would never be subject to review.

One suggested solution to this problem is – for CEIP review purposes – to add an “informal” “Control Point” at 2038 – which is within the 20-year planning window, and which in turn would represent a “Glide Path” point of about 90/10 – 90% emissions free. This then would help explain (for example) to UTC and Stakeholders what exactly utilities are planning to do with their NG Peakers, when will they retire, how would they be replaced, and how cost-effective – or

not – they would be in terms of “Early Retirement, aka Stranded Assets.”

Another approach to this problem would be for UTC to require utilities to include running 20-year-out planning data in their CEIPs, including NG acquisitions and retirements within that 20-year planning period. Then for example a 2022 CEIP would have to explain acquisitions and retirements through 2042.

Thank you for your consideration,

James Adcock, Electrical Engineer