

August 15, 2013

The Honorable Dave Danner, Chair
Washington Utilities and Transportation Commission
Attn: Dockets UE-120767 and UG-120768
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

2013 AUG 16 PM 3:59

Dear Chairman Danner:

On behalf of the undersigned Washington State Community and Technical Colleges, we are providing comments on Puget Sound Energy's Integrated Resource Plan (IRP). We encourage the Washington Utilities and Transportation Commission (UTC) to ensure accountability for the greenhouse gas (GHG) emissions from electricity generation resources just as our institutions ensure accountability for our GHG emissions.

In 2006, the Washington legislature mandated (HB 1010) that electric utilities submit an IRP in which utilities present long-range expectations for electricity resource needs. The UTC is then obligated to seek public comment on those IRPs. We – as utility customers and as state-based institutions committed to accountability for our GHG emissions – are providing comments because our emissions are dependent upon Puget Sound Energy's fuel portfolio.

All of our state-funded institutions are obligated to meet mandates set out in RCW 70.235.050, Greenhouse gas emission limits for state agencies — Timeline — Reports — Strategy — Point of accountability employee for energy and climate change initiatives. This includes:

- (1) All state agencies shall meet the statewide greenhouse gas emission limits established in RCW 70.235.020 to achieve the following, using the estimates and strategy established in subsections (2) and (3) of this section:
 - (a) By July 1, 2020, reduce emissions by fifteen percent from 2005 emission levels;
 - (b) By 2035, reduce emissions to thirty-six percent below 2005 levels; and
 - (c) By 2050, reduce emissions to the greater reduction of fifty-seven and one-half percent below 2005 levels, or seventy percent below the expected state government emissions that year.

In addition, some of the under-signed institutions have signed on to American College & University Presidents' Climate Commitment which includes the following agreements for each institution:

- Complete an emissions inventory.
- Set a target date and interim milestones for becoming climate neutral.
- Take immediate steps to reduce greenhouse gas emissions by choosing from a list of short-term actions.

GHG emissions from electricity account for a significant portion of our institutions' GHG inventory. While each institution is taking actions to mitigate these impacts—such as lighting retrofits and HVAC improvements—the coal-intensity of PSE's electricity resources continues to be the main source of our institutions' GHG emissions from electricity. We have made serious efforts on our obligation to address our consumption, many with the support of utility conservation grants, but ultimately it is equally appropriate that state-regulated electric utilities address their supply.

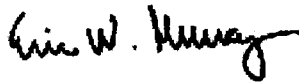
Puget Sound Energy's draft IRP did not provide adequate consideration of the customer interests in greenhouse gas emissions nor the potential for regulation by the state or federal government within the next five to ten years. Fourteen state senators and representatives wrote a letter to the UTC on April 17, 2013 asserting the same assumption: that "leaving carbon accountability out of the final [IRP] scenario...is no longer reflective of current realities." In addition, the Washington legislature recently passed SB 5802 mandating a review of climate policies that they are to recommend back to the legislature for consideration in 2014. This policy review includes examples from California where the price is \$10/ton of carbon dioxide (CO²) and British Columbia with a \$30/ton CO² tax. If either of these policies were adopted, that would provide additional incentive to transition off coal-fired electricity to cleaner, more sustainable forms of energy.

Our institutions are preparing students for a future in sustainable programs and technologies and we hope we share common purpose in directing our resources to clean-energy jobs and technologies right here in Washington. Doing so will help us meet our climate obligations and commitments and serve the interests of Washington State.

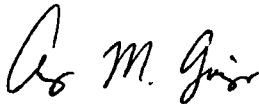
Sincerely



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