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Subject: Comments for Docket U-180907
Date: Wednesday, December 19, 2018 1:37:24 PM

Dear Commissioners,

For Docket U-180907, please include these comments:

CSEE would like to remind the Commission of a document entitled “Comments on Puget Sound Energy’s 2017 Integrated Resource Plan, Washington Utilities and Transportation Commission Docket Nos. UE-160918 & UG160919,” submitted on January 23, 2018, by the consulting firm of Synapse Energy Economics. Specifically, of particular interest are these excerpts from pp. 1-2:

“Synapse has also identified several areas upon which PSE could and should improve in future IRP cycles, including:

“• Renewable cost assumptions. PSE employs an array of assumptions that overstate the capital, operational, and transmission costs associated with renewable resources. These assumptions could bias the determination of the most cost-effective means of complying with Washington State’s Renewable Portfolio Standard. They also artificially undermine the competitiveness of renewables relative to other types of resources.

...
“• **Data access and transparency. Unlike in many similar IRP proceedings that Synapse has participated in, we were unable to review PSE’s modeling files or other workpapers. This limits the effectiveness of stakeholder review.** [emphasis is mine]

...
“Based on these findings and concerns, we offer the following recommendations:

“• **The Commission should ensure the opportunity for full stakeholder participation in PSE’s resource procurement process, particularly if that process leads PSE to make a procurement decision at odds with this IRP.** [emphasis is mine]

...
“• In future IRP cycles, the Commission should require PSE to:

...
“• **Provide access to non-confidential workpapers and modeling files to interested stakeholders, and provide confidential workpapers to those who sign nondisclosure agreements...**” [emphasis is mine]

The full report is at

https://www.utc.wa.gov/_layouts/15/CasesPublicWebsite/GetDocument.aspx?docID=468&year=2016&docketNumber=160918

Synapse Energy Economics’ experience with PSE is yet another troubling example of the usual (and predictably WUTC-allowed) razzle-dazzle and stonewalling from PSE whenever asked to produce hard facts and documentation. PSE has repeatedly gotten away with this

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inexcusable behavior in the past because the WUTC's response has reliably been the usual weak "revise your IRP, please."

It is time to stop kicking the can down the road.

Sincerely,

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