

From: [Richard Davis](#)
To: [Public Involvement \(UTC\); ceip@pse.com](#)
Subject: UTC Docket UE-210795
Date: Sunday, February 6, 2022 3:28:12 PM

External Email

On 02/06/2022 2:26 PM Richard Davis <wsba12481@comcast.net> wrote:

Comments on PSE Clean Energy Plan

by Richard J. Davis
11846 Deer Trail Ln SW
Olympia WA 98512

1. Acronyms and Definitions:

kV

A kV is not a unit of energy. The definition should be: Kilovolt equals 1000 volts of electrical potential. PSE uses kilovolts as a standard measurement when discussing distribution lines.

2. Executive Summary:

The first sentence ends with "...wind, and other hydroelectric facilities." The phrase "other hydroelectric facilities" is does not clearly refer to the previously mentioned hydroelectric dam. It seems to state that Wildhorse and Hopkins Ridge are hydro facilities and they are not. Please make the statement clear.

3. Figure 1-1: Round target numbers to the nearest thousand. Targets and goals should not have 6 significant digits.

4. Figure 1-2: The test includes, "Improved affordability of clean energy." Compared to what and when?

General Comments

5. The economic analysis in the appendices is inadequate and incomplete. For example:

- a. I could not find the inflation rate that was assumed.
- b. Much equipment will be purchased, such as batteries and photo electric arrays. What are the economic and useful life of that equipment? These numbers need to be included in the spreadsheets.
- c. Additional costs for the CEIP should be reported by average consumption per residential customer, as it is. Also report the same by kWh for residential and commercial customers, including taxes and any surcharges applied to those costs.

6. It would be useful to have a curve showing cost (abscissa) as the percent of clean energy approaches 100% (ordinate). The curve should start at zero cost and zero clean energy.

7. The statute requiring the utility to provide clean energy essentially causes PSE to become a tax collector for performing a governmental goal of achieving clean energy. Thus, a utility that is regulated to control monopolistic economic power is now being used to try to affect climate change.

8. The probability of actually achieving the goal of reducing carbon dioxide emissions should be stated. I would guess it will be a very low number, approaching zero. The likely outcome is a small reduction in the price of fossil fuel, which will increase demand for these fuels by other utilities. There will be a modest increase in the utility cost for housing, tending to increase homelessness. There will be more customers defaulting on their electric bills. There will be less reason for businesses to remain in Washington, and more reason for those of us living here to leave the state.

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9. I remember discussions of climate change from about 1970 and 1971. My brother-in-law was asked about it when applying for a graduate engineering degree at Dartmouth in Hanover, New Hampshire at that time. The U.S. population was half of what it is now, and the efficiency of automobiles was dropping, causing more carbon dioxide emissions. We have acted too slowly on this. It is a world-wide problem, and must be solved by all nations acting in concert. The state of Washington cannot succeed at what it intends. It will not work and the citizens of Washington should not have the CEIP forced on us like this. This is a problem that must be solved by the U.S. government working with other nations, and soon. Also, the goal of accepting a 2 degree Celsius temperature rise is too high of a temperature. We have a tough job ahead.