

## Huey, Lorilyn (UTC)

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**From:** Snyder, Jennifer (UTC)  
**Sent:** Wednesday, February 24, 2021 12:04 PM  
**To:** UTC DL Records Center  
**Subject:** FW: Docket Number: Avista UE-200301, UG-190724; Puget Sound Energy UE-200304, UG-200305 Comments

Good morning Records Center,

Please add this comment to dockets UE-200301 and UG-190724.

Thanks,

Jennifer Snyder (she/her)

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Utilities and Transportation Commission

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This email states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

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**From:** cindyalia@comcast.net  
**Sent:** Tuesday, February 23, 2021 10:45 AM  
**To:** UTC DL Conservation & Energy Planning Group  
**Cc:** UTC DL Commissioners  
**Subject:** Docket Number: Avista UE-200301, UG-190724; Puget Sound Energy UE-200304, UG-200305 Comments

External Email

Conservation and Energy Planning Group, UTC Commissioners,

Clean Energy Transformation Act  
IRP and CETA Rules

Avista, PSE, and UTC  
Clean Energy Transformation Act  
IRP and CETA Rules

The planned meetings for the IRP web based meetings listed here at this link do not provide a portal for comment by the public: <https://www.utc.wa.gov/docs/Pages/calendarOpenMeetings.aspx> This is in error as the public meetings are limited to those who know about and sign on for a webinar but the public meetings do not allow or provide for comment by other members of the public. Please consider corrections to the process for public meetings as soon as can possibly be done to provide for a broader context in public comment and interaction which will result in a better and more informed public comment.

Citizens' Alliance for Property Rights is concerned the continued path down the compliance road with the CETA will lead to similar debacles experienced in California and Texas regarding the unintended consequences of rulemaking after the passage of CETA in 2019 in the Washington legislature.

While many of the aspirations considered in the rulemaking scope are worthy, it is difficult to determine if the below questions have been given adequate consideration in rulemaking and if there has been flexibility provided in compliance goals to avoid some of the more important failure scenarios experienced and presented by other states with similar legislative goals. How can Washington state do better than California and Texas in reaching the aspirations of CETA through rulemaking?

What is Avista or PSE doing to prevent skyrocketing price spikes during extreme weather events as recently occurred in Texas with loss of power and 4 digit electric usage bills?

What is Avista or PSE doing to prioritize infrastructure maintenance of power and gas lines to avoid catastrophic and deadly forest fires as were experienced in California?

How will Avista or PSE avoid situational black outs or rolling brown outs as has been experienced in California during peak usage and or shutdowns due to environmental conditions such as severe weather or wind events? Has maintenance prioritization been taken into consideration in the rulemaking in regard to this scenario where power supply is denied customers in order to protect the companies or state from bearing responsibility or liability for prevention based outages?

How will Avista or PSE ensure natural gas is available to manufacturing companies that rely on the clean, efficient, and powerful resource of natural gas that cannot be adequately replaced by electricity?

Please see this link to the CAPR website for more information on our concerns:  
<https://proprights.org/blog/electric-grid-jeopardy-important-avista-meeting-wed-feb-24th>

Thank you  
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