

For the attention of: The Washington Utilities and Transportation Commission. (UTC)

REF: Dockets UE 240004. Docket UG 240005.

To members of the UTC, I thank you for all of your work and over-site of utility companies, in order to protect us as consumers, thank you.

I ask for and appreciate your indulgence to read my letter.

Factual evidence and information I have included in this letter support my objection to requested increases to electric and natural gas rates by PSE. My objection is based on actions by PSE both in the past and present that show they have not lived up to the code of conduct they outline in their 'Corporate Governance Statement,' which includes 'to do what is right...,' '...by working in an honest and ethical manner,' and '...to serve customers with integrity.'

The issues raised in the former paragraph, as well as information that follows, including calculating 'Recoverable Costs,' create questions about how reliable and accurate costs passed onto consumers are. Calculations by PSE take place on a foundation of what appears to be shifting sands, costs to be recouped in the form of rate increases on the backs of struggling consumers, held captive by a monopoly with no options but to comply.

PUGET SOUND CORPORATE GOVERNANCE STATEMENT.

Puget Sound Energy states in its 'Corporate Governance Statement and Code of Conduct
Quote:

'Our compliance program and ethics code seek to bolster our continued success as a valued company. This program is more than simply fulfilling a legal requirement. It is an important tool for preserving our corporate culture and core values.'

While our code covers a number of topics, it really can be summarized in one simple sentence: **Do what is right.** PSE employees help ensure that we uphold the code, company policies and the law by **working in an honest and ethical manner.**

We look forward to continue serving our customers with hard work, dedication, and **integrity** at the forefront of all our efforts.'

End of quote.

I understand that the UTC take into account, when evaluating requested rate increases, any costs incurred by PSE that are recoverable, and costs that have already been recovered, not allowing 'Double Recovery.'

Quote:

'The Company believes a significant portion of its past and future environmental remediation costs are recoverable from insurance companies, from third parties or from customers under a **Washington Commission order.**'

End of quote

<https://caselaw.findlaw.com/court/wa-court-of-appeals/1017865.html>

Ref: PUGET SOUND ENERGY INC v. ALBA GENERAL INSURANCE COMPANY (2000)

Representatives of PSE argue that they gave low estimates of remediation costs, and what they projected was not enough.

The trial court agreed with the insurers that these representations established that PSE had already recovered sufficient funds to satisfy its known environmental costs at the six sites.

The portion of recovery costs PSE requires of its customers in the form of increased rates, is an area of potentially shifting sands? PSE can say even though they asked for a certain amount, they can later say they miscalculated and need more money?

LNG FACILITY IN THE PORT OF TACOMA.

Detailed in a quote from the Washington Conservation Action group below, outlines an example of how PSE showed total disregard for 'doing what is right,' was not 'working in an honest and ethical manner,' and not 'with integrity,' codes of conduct they say they adhere to.

They showed total disregard for complying with permitting processes and their aggressive posture lacked integrity. They pushed ahead with the construction of the LNG (Liquid Natural Gas Terminal) in the Port of Tacoma Tied Flats, an environmentally fragile area.

**** <https://waconservationaction.org/the-fight-against-tacomas-new-lng-facility-continues/>**

Quote from the link.

**** 'The 8 million gallon LNG facility has faced years of opposition from the Puyallup Tribe and the local community citing climate, health, and safety concerns. While PSE has continuously sought to mislead the public that their facility represents "clean energy" progress, the review process itself has been met with community outrage over the use of outdated science, failure to consult with the Puyallup Tribe, and PSE's two years of defiant and illegal construction of the facility prior to receiving required permits.'**

End of quote.

PSE still expects us to pay with increased rates, even though we were disregarded in this process, and there is an ongoing risk of pollution to this area?

The Port of Tacoma incorrectly claimed they owned the land, and leased it to PSE. The property was proven to be owned by the Puyallup Tribe, PSE should have known – known too late.

NOW PSE STATES IT IS FAZING OUT LNG, AND DEMANDS THAT RESIDENCES CONVERT TO ELECTRIC? Why do we allow them so much power and influence?

Why are customers being made to pay for this facility, which is the result of so many failures on so many levels by the corrupt culture inherent in how PSE does business, 'misleading the public, the use of outdated science, failure to consult with the Puyallup Tribe, and PSE's two years of defiant and illegal construction of the facility prior to receiving required permits.'?

<https://www.msn.com/en-us/money/companies/natural-gas-customers-set-to-see-refund-in-portion-of-costs-tied-to-tacoma-s-lng-plant/ar-AA1nJNpv>

PSE over-charged regulated customers of natural gas during their 'Cost Recovery Process'. Apparently they are now dragging their heels deciding what amount needs to be refunded. PSE is also guilty of air pollution violations – why am I not surprised?

Quote:

Apr. 26—State regulators have given approval to Puget Sound Energy's push to recover some of the costs tied to its liquefied natural gas plant in Tacoma's Tideflats, but some customers will carry a bit less of that financial load.

Regulated natural gas customers and unregulated LNG clients help foot the bill in PSE's cost-recovery effort. **But a still-to-be determined amount is set to be refunded** to regulated customers as a result of a new order issued Wednesday by the state Utilities and Transportation Commission.

UTC also put PSE on notice over the site's operations in Wednesday's order, which stated, "**The company must take reasonable and appropriate steps to prevent air permit violations.**"

The decision comes after revisions to its current natural gas tariff filed in May 2023 by PSE to recover costs of the plant's construction and operations.

End of quote.

PRIVATE EQUITY FIRMS OWN PSE

Locally based companies such as PSE, should not be owned by private equity firms far removed from where customers live. The main underlying incentive is to maximize profits by how they organize their multiple subsidiaries and holding companies. The out of state location of said associated companies breeds a lack of knowledge and concern for the realities on the ground for their customers.

Customers through ever increasing rates carry the burden of wealth being siphoned off by the payment outrageous bonuses, dividends and incentive pay to officers, as well as placing the cost of poorly assessed infrastructure needs on us?

The interconnected nature this complex of companies, its subsidiaries, holding companies, governing bodies and investors is not easy to keep track of. They are summarized in the paragraph that follows. Wealth is extracted on the backs of struggling Washington residents, the consumer, wealth that enriches a few – many of whom don't live here and never have.

Puget Sound Energy Inc, is a subsidiary of Puget Energy Inc. All of the voting stock of the latter is held by Puget Equico LLC, an indirect wholly owned subsidiary of Puget Holdings LLC. All of the outstanding shares of voting stock of PSE Inc, are held by Puget Energy Inc. PSE pays cash dividends and distributions to PE. PE pays dividends and repays debts. or other expenses. Puget Holdings is owned by a consortium of long term infrastructure investors in Canada.

Other investors named are based overseas in the Netherlands, and here in the US. Puget Sound Energy Inc and Puget Energy Inc are registered in the State of WA, a legal requirement. We are purely a cash cow to provide ever increasing wealth for this company and its associates.

Quote:

'The company's **strategy** emphasizes meeting the energy needs of the growing PSE customer base through incremental, cost-effective energy conservation, low-cost procurement of traditional energy resources (including by producing and generating electricity and natural gas), and far-sighted investment in energy-delivery infrastructure.'

End of quote.

Customers experience frequent failures in the delivery of energy, despite the installation of high capacity infrastructure from Renton through Bellevue to Redmond, mainly intended for Bellevue, and not needed in Renton.

Earlier this year we lost power in Renton for 4 hours, on a calm day, no freezing temperatures, no wind, no rain, no inclement weather. PSE declined to explain why this outage occurred, representatives stated they didn't know? What can we expect as the weather worsens this winter?

We should not be asked to pay more for a system that fails us, especially during the times when we need it most.

PSE's AGGRESSIVE PUSH TO PURCHASE CHEAP AGRICULTURAL LAND IN WA.

They are a predatory utility company, and extremely aggressive in their current push to purchase cheap agricultural land, without regard for risks to the environmental, to communities whose livelihood will be impacted, and to health .

Based on historical fact and past behavior, PSE can't be trusted to have our wellbeing and best interests at heart, or to charge us fair rates, for what is often unreliable service. Rates are calculated on a foundation of shifting sands, only after extracting funds to pay dividends, bonuses, exorbitant pay scales, pension funds and investors in other countries etc.

BESS and LNG BESS (Battery Energy Storage Systems) are not clean energy alternatives, nor are they safe, despite alleged safety measures and remote monitoring. LNG is not a clean energy alternative.

We are still being required to foot the bill, and care is not being taken to locate energy infrastructure in areas that are appropriate, in order to decrease the risk to communities and the environment?

Based on PSE's mode of operation, lacking thorough and careful study, ignoring true science, and ignoring permitting processes, increasing rates will result in the future from projects that will be inappropriately located, putting the environment and communities at risk, with the goal only to fatten the purse of a for profit company?

ANOTHER EXAMPLE OF THE DANGEROUS, CARELESS AND AGGRESSIVE DRIVE OF PSE TO PUT INFRASTRUCTURE IN A TOTALLY INAPPROPRIATE AREA.

PSE associated themselves with a powerful billion dollar energy investment company from out of state called TENASKA. Companies such as this are driven by profit, and have the money and resources they believe will allow others to be bullied and pressured. The goal was to build a BESS facility that was doomed for approval from the start. It was proposed to build in a small area, surrounded by documented slide hazard, within a 100 year flood plain, in close proximity to the Cedar River Watershed, and 50' from a well established, low income community. They did no due diligence studies, obviously had no concerns about the critical aspects of the site in question, or for the established limits to development outlined by the designation and zoning applied to this parcel, risks to the environment, the community, and our water supply. It was to have been a 9.3 acre grid sized BESS in Renton.

We are already on the hook to reimburse PSE through ever increasing rates, for a project that was not permitted, wanted by the public who were ignored, located in an environmentally fragile area regardless of the risks, etc. etc.

Yes, there is a goal to move away from fossil fuels and the risks associated with climate change, but that doesn't mean we should accept new risks that will result from PSE's careless, thoughtless and blind push to do whatever it takes regardless?

We refuse to carry the financial burden being requested in the form of ever increasing rates, for infrastructure that does not have our well-being at heart and the health of communities and the environment.

OFFICER PAY AND PERKS, INVESTOR DIVIDENDS, ETC.

Mary Kipp CEO PSE since 2020. The following numbers represent only a small portion of what individual officers receive.

Quote:

'2022-2024 Long-Term Incentive Plan Target Awards

Consistent with prior years, target LTI Plan awards for the 2022-2024 performance cycle were denominated in dollars, taking into account the executive's level of responsibility within the Company and the corresponding market data.

Ms. Kipp's target LTI Plan grant was increased to \$3,700,000 to align with market pay levels. Target LTI Plan award amounts for the 2022-2024 performance cycle are shown in the following table.'

Name Target Long Term Incentive

(\$) Mary E. Kipp \$3,700,000 Kazi Hasan 1,000,000. Allan (Wade) Smith 1,260,000. Margaret F. Hopkins 405,000. Andrew Wappler 380,000. Steve R. Secrist

End of quote.

NOTE: PSE invests millions of dollars in officer pay, to make sure they don't run afoul of Washington State Law and other State and National regulations. It's a pity they don't apply the same due diligence to the required processes involved when proposing energy infrastructure development?

Quote:

'PSE is working toward an aspirational goal of being a Beyond Net Zero Carbon energy company by 2045.'

End of quote:

The critical question is, how do they propose to accomplish this?

Will PSE follow the rules involved in the permitting of infrastructure development, are they going to accurately take into account risks to the environment and communities?

PSE calculates many expenses it incurs to its financial benefit, seeking reimbursement on the back of consumers, and at the same time pays exorbitant incentive pay to officers, dividends to investors, etc. We are required to pay for infrastructure such as the LNG at the Port of Tacoma that is to be phased out, its capacity decreased, not forgetting the manner in which this facility came about, which I have already detailed.

Why should we pay increased rates for infrastructure that does not meet demand because of miscalculations by PSE? We deal with frequent failures associated with outdated/obsolete transformers that malfunction and are under capacity?

I have given evidence in this letter that suggests on many levels that WA residents need to treat PSE with a degree of caution, regarding what they say their financial needs are and thoroughly question what they are demanding we pay.

By their actions PSE has shown an absence of any real interest and concern for the well being of our communities, and for the environment. They have misled and ignored the public, whom they have failed to consult, skirted or ignored current science and established permitting processes. PSE is focused on driving forward with their plans no matter what, and the priority given to their ever increasing corporate profits cannot be minimized and requires scrutiny.

I respectfully request that the UTC deny the requested rate increases. I ask that the UTC require PSE to re-allocate funds, in order to redistribute current finances as necessary, in order to continue to provide energy to the residents in WA, both electric, gas and LNG at the current or reduced rates to customers.

Thank you for your time.

A handwritten signature in black ink that reads "Nicola Robinson". The signature is written in a cursive, flowing style.

Nicola Robinson.

3110 SE 5th St.

Renton, WA 98058-2824