From: Dan Miller
To: Danner, Dave (UTC)
Subject: PSE LNG is not in the public interest!
Date: Tuesday, March 30, 2021 4:48:47 PM

External Email

Dear Commissioner Dave Danner,

Dear Commissioners Rendahl, Danner, and Balasbas,

I am writing to request an investigation and public hearing regarding Filing No. UG-210111, to ensure that the affiliated interest contract between Puget LNG and Puget Sound Energy serves the public interest.

This contract between Puget LNG and Puget Sound Energy is not in the public interest because it would allow operations to proceed at the Tacoma LNG facility despite unexamined safety risks due to design changes at the facility and an inadequate SEPA review. In January, 2021, Washington Attorney General filed an amicus brief in support of the lawsuit challenging PSE's LNG facility, stating that "by obscuring the Project's actual climate impact and omitting the speculative nature of its assumptions, the FSEIS failed in its primary purpose under the State Environmental Policy Act (SEPA)."

It is unacceptable to allow PSE to begin operating the LNG facility before the Puyallup Tribe and environmental advocates challenging the Tacoma LNG project before the Pollution Control Hearings Board receive a decision on their appeal. PSE is only nearing completion of their LNG facility due to illegally beginning construction in 2017--two years before receiving all necessary permits, for which PSCAA issued a notice of violation that PSE continued to ignore. Allowing PSE to begin operating in the midst of unresolved legal challenges and due in part to illegal construction would be unjust and in blatant disregard of the public interest.

Furthermore, there is no urgency to begin operations at the facility, as PSE currently has no demand for Liquefied Natural Gas (LNG). LNG for fueling marine vessels--purportedly the primary purpose of the facility--is not needed until next year. PSE has only one vessel fueling contract, which is with TOTE Marine, and TOTE needs to retrofit its ships to run on LNG which it does not anticipate completing until the first quarter 2022 at the earliest. Nor does PSE anticipate needing LNG for peak shaving until at least December 2021, because it is only forecasted to be needed during periods of high demand during the coldest winter months.

Permitting the Tacoma LNG facility to begin operation before legal challenges have been resolved, despite PSE's illegal construction and in the face of vocal opposition from frontline communities and Puyallup Tribe perpetuates environmental racism and can never be construed as in the public interest. It is essential that the Puyallup Tribe and advocates have a fair hearing, which is not possible if PSE is allowed to turn on the facility in the midst of deliberation.

Furthermore, there remain unexamined safety issues, inadequate environmental review, and no immediate need for LNG stored at the facility. The UTC should delay the effective date of this

contract, prepare updated siting and safety studies, and conduct further proceedings, including an investigation and public hearing, to ensure any contract between PSE and Puget LNG truly serves the public interest.

Sincerely,
Dan Miller
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