

Wednesday, September 28, 2022

Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250, Olympia, WA 98504-7250

RE: Dockets UE-220066 and UG-220067

Dear Executive Director Maxwell:

I do not believe that PSE's decision to build the Tacoma LNG facility was financially prudent, and therefore, I do not believe that it should be included in the rate base.

The Tacoma LNG Plant was not the "least reasonable cost" solution to meeting natural gas demand. The least reasonable cost solution was for PSE to stop promoting gas and to suspend new gas hook ups. Past PSE IRPs clearly show that conservation and gas customer attrition are sufficient to lead to slowly declining demand, which can ensure adequacy of supply for cold winter conditions in which peak gas demand occurs. The no gas promotion and no new gas hookups policy is a no-cost solution that would obviate any gas-grid need for Tacoma LNG and any rationale for including Tacoma LNG in the rate base.

As a rudimentary understanding of climate science indicates, the natural gas grid needs to go away. It is a leaky network distributing a potent greenhouse gas and is incompatible with a stable climate. As those with financial means increasingly abandon unhealthy and climate-damaging household gas appliances in favor of clean, renewable electric ones, only customers without financial means will be left to support the fossil gas system. Allowing Tacoma LNG into the rate base would worsen the inevitable fossil gas death spiral threatening essential energy services for the poor.

In testimony I submitted to the Puget Sound Clean Air Agency in 2019 (copied below), I pointed out five significant errors in the Environmental Impact Statement for Tacoma LNG. If any one of these errors were corrected, Tacoma LNG would be found to increase rather than decrease greenhouse gas emissions. Correct them all, and it's clear that Tacoma LNG does significant damage to the climate and to aspirations of Washingtonians to respond responsibly to the climate crisis.

Building Tacoma LNG without first obtaining the necessary permits was not financially prudent.

Building Tacoma LNG without first resolving treaty rights of Native Americans to the land on which it was built was not financially prudent.

Building a 1.7 million gallon LNG tank containing the energy equivalent of 11 Hiroshima-sized bombs in a populated area, which could explode due to earthquake or malice, was not financially prudent.

Please do not force ratepayers to pay for this egregious PSE mistake. The financial burden resulting from this willful and reckless management decision belongs with PSE owners.

Sincerely,

Robert Briggs

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Comment Presented at PSCAA Board Meeting

Thursday, September 26, 2019

Good morning. My name is Robert Briggs. I am a retired research scientist, formerly with Pacific Northwest National Laboratory.

I have spent most of my professional career reading and writing reports similar to the Final Supplemental Environmental Impact Statement for the Tacoma LNG project. I don't recall ever encountering in print a report this shoddy. It is poorly written and unclear, it contains materially false statements, it lacks proper references, and omits crucial data necessary for technical review. The document would not be publishable in any refereed publication due to these many deficiencies.

When we requested numerical data for inputs and outputs for the life-cycle analysis, we were told that our request was being treated as a public comment. PSCAA's handling of comments made on the draft SEIS, I would characterize as generally unresponsive.

The FSEIS document properties have been set to encumber review and comment, access to the LCA model has been withdrawn, and this raises the question, "What is PSCAA trying to hide?" The Executive Summary talks about a greenhouse gas "benefit" from the project, but even a casual review of the sources of uncertainty for inputs to the model would cause a reasonable person to infer that there is no significant benefit.

However, in my written comments on the FSEIS, I identify five areas, which if handled using normal standards of care, would lead to the conclusion that Tacoma LNG will lead to an increase, not a decrease, in greenhouse gas emissions.

1. Slippage, unburned methane emitted by marine diesel engines – A value representing the extreme low end of the range of available data was used, not a mid-range value, as would be customary. And studies showing a higher value was ignored, in spite of PSE's own peer reviewer recommending that it be included in the analysis.
2. Canadian gas, with lower upstream emissions rate, was assumed in spite of the fact that gas is a fungible commodity, and the increase in gas demanded by Tacoma LNG will cause others in our region to purchase more gas from the San Juan Basin, reputed to have the highest methane leakage rates in the country.
3. Upstream leakage rates have been gamed. Rather than using values from their models that represent the best available science, PSCAA has used a low estimate for their "upper sensitivity" and a very low rate for their baseline.
4. PSCAA uses a global warming potential for methane that understates its warming impact relative to CO₂ by 50% over the study's time horizon, and by more than 70% over the critical 11 year that the IPCC tells us we now have left to avert catastrophic climate damage. This is wildly at odds with the pronouncements of the world scientific community calling for urgent, near-term action to reduce greenhouse gas emissions.

5. PSCAA assumes a “no action” alternative that assumes no progress will be made in reducing greenhouse gas emissions from marine engines over the next 40 years. This flies in the face of carbon-free technologies that are proven and in use and of international commitments that have been made, and assumes abject failure of our political institutions to address the climate crisis.

Performing the analysis correctly in any one of these five areas will lead to the conclusion that Tacoma LNG will result in a significant increase in greenhouse gases. Perform the analysis correctly for all five, and it becomes clear that Tacoma LNG is an enormous blow to our region’s aspirations to do our part to address the current climate emergency.

It would be very unwise for anyone serving on this board with future political aspirations to rubberstamp this permit. You’ll find ample evidence in the written comments that have been submitted to simply reject the permit outright.

Thank you.

Robert S. Briggs

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