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| **From:** | Danner, Dave (UTC) |
| **To:** | Records Management (UTC) |
| **Subject:** | FW: PSE LNG is not in the public interest! |
| **Date:** | Thursday, April 1, 2021 2:50:26 PM |

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**From:** Laura Feinstein
**Sent:** Thursday, April 1, 2021 2:50:20 PM (UTC-08:00) Pacific Time (US & Canada)
**To:** Danner, Dave (UTC)
**Subject:** PSE LNG is not in the public interest!

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. I am very concerned that expanding natural gas infrastructure in Washington is a poor choice at this juncture. We have entered into an existential climate crisis and we need to be unwinding the dependence on natural gas immediately--not expanding facilities and digging a deeper hole that comes with worsening effects from climate change. Our governor has committed to a carbon-neutral economy by 2050-consider the stranded asset risks associated with this project.

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 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.

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.

Ultimately, if the commission does decided that this project should move forward, I would strongly encourage the WUTC to consider forcing the use of 100% biofuels at this facility. PSE has boasted about its contract with the Republic landfill for renewable natural gas. Furthermore, they will be receiving RNG from Tacoma's wastewater treatment facility nearby. Force them to utilize this RNG for all of the services out of this LNG facility.

Sincerely,
Laura Feinstein
3311 Lafayette Ave S
Seattle, WA 98144