

Comments by James Adcock on Integrated Resource Planning rulemaking UE-190698

Docket number of this proceeding: UE-190698

Commenting party's name: James Adcock, Electrical Engineer

The title and date of the comment or comments:

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11/8/2019

James Adcock
5005 155th PL SE
Bellevue WA 98006
jimad@msn.com

Received
Records Management
11/08/19 16:16
State Of WASH.
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COMMISSION

I am a member of what Puget now calls "TAG" but previously called the "IRP" process. I have been so for about the last 10 years. I am an electrical engineer, graduate of MIT, with a background in statistical modeling, and over ten years focus on climate change and policy in the Pacific Northwest.

I will use the terms "TAG" and "IRP" interchangeably below, since I believe the "TAG" designation is simply an invention by Puget to content-censor public participation -- by "ejecting" those public participants who take positions which Puget doesn't want to hear.

During the ten years I have been a member of Puget's IRP and/or TAG process the treatment of the public participants has gone from bad to worse. I could feel personally insulted, maybe I should feel personally insulted -- but by now Puget is treating almost all of the public participants as badly as they have treated me. Further, I believe Staff has also begun to realize that something is fundamentally wrong with how Puget is treating public participants, and how Puget is conducting the IRP process.

Most recently, this latest IRP cycle, Puget acted to exclude me entirely from active participation -- after being an active participant for the last ten years. Puget did this for an obvious reason: I told Puget things that Puget didn't like to hear -- such as using weather data which is now 100 years out-of-date just doesn't make sense and is a 'rip-off' to consumers, that it is a 'ploy' to increase the supposed need for new Peaker plants! And that their modeling techniques are mathematically incorrect in the presence of climate change, etc. So, Puget responded by acting this IRP cycle to exclude me entirely, in what is known as "content censorship." Only intervention by Staff forced Puget to reconsider and allow me to participate.

A fundamental part of the problem is that Puget has been openly hostile to the IRP process from day one. Puget's working position has always been "We have to go through this 'IRP routine' but we sure don't have to like it, and we sure don't have to use the public input!"

And now, with the passage of CETA, since most of what public participants have been calling for has been enshrined into CETA law, one would think that now Puget's position should be aligned with public participants, right? Puget must now 'want' to do what the law requires right? So, Puget must now

agree with public participants, right? And Puget must stop all the ploys and game playing and "just get on with it", right? I mean CETA law is exactly that which Puget [and Commissioners] have been asking for the last 10 years -- "Bring us a law, just bring us a law and we will clean it up!" CETA is that law you have been calling for. Puget now needs to build 15 gigantic wind farms, or their equivalent, in the next ten years, to meet the CETA 2030 80% requirements, so Puget has no time and energy to waste, right? Get on with it immediately, no more game-playing, right?

Wrong. Puget keeps on doing the same-old same-old game playing and ploys. From which I can only logically conclude that Puget does not intend to faithfully fulfill the 2030 CETA requirements. Because if they did intend to faithfully fulfill those requirements, then the positions of Puget and the public participants would be aligned -- and there would be no need for Puget to continue the ploys and game-playing.

Here are some concrete suggestions which I have told Staff and Commissioners before, and will here repeat again:

1) Please audio record the IRP meetings and include them in the IRP records, so that when there is a disagreement about what happened at a meeting Commissioners or Staff can go back and listen for themselves: Are participant questions being answered, or being stone-walled? Are participants treating Puget insultingly, or is Puget treating participants insultingly -- or both? Are participants 'wasting time' or is Puget 'wasting time' at the meetings -- or both? I suggest that if both sides of the IRP know that their actions are being recorded for possible future review that behavior, on both sides, may improve.

2) Please require Puget to record and post publicly ALL questions that are asked and not fairly and fully answered to the participants satisfaction at the IRP meetings. Require that Puget's official answers to those questions also be published publicly, so that Commissioners and Staff can see if questions are being fairly answered, or if it is simply that Puget keeps stonewalling the questions year after year after year, IRP cycle after IRP cycle after IRP cycle, decade after decade.

3) For the last ten years I have called on Puget to perform a simple "sanity check" on their modeling: Since using their Monte Carlo methods in their modeling efforts with 100-year-out-of-date "weather" data is mathematically incorrect -- due to the large lack of "statistical stationarity" in the data -- meaning that due to climate change Coldest Winter Days (TMIN) have increased by 15 degrees ALREADY -- that they should at least perform a "quasi-stationary" "double-check" on their base-case modeling by using only "weather data" [actually: "climate data"] from the most recent 25 years or so. Please note for these same reasons NOAA [The Nation's Weather Service] only uses "climate data" [weather data for climate analysis] FROM THE LATEST 10 YEARS! But, ten years and counting of IRP meetings, and Puget is still ducking this question.

4) Please set an expectation that "public participation" means that about one half the time Puget talks and participants actively listen, and the other half of the time participants talk and Puget actively listens, and that these things need to be happening at about the same time. As opposed to right now it is simply "Puget *Presents*" -- their own choice of words. Instead participants should be encouraged to ask questions, and Puget must EXPLAIN [as explicitly required in the IRP statute] to participants when Puget says something confusing, obscure, or seemingly incorrect. And Puget must plan their meetings ahead of time for this to happen. No excuses: "Oh darn we have such an action-packed IRP meeting this time, so Puget gets to talk 100% of the time and participants are not allowed to say anything nor ask any

questions!" For example, in the most recent IRP/TAG meeting Puget showed a "CETA Ramp" that begins from Puget's current I-937 *Renewables* position, and not at Puget's current CETA *Non-emitting* position. I asked Puget how this could make sense, given that CETA doesn't even regulate renewables, but rather regulates emitting and non-emitting? Puget's 'explanation': "This is what we are doing. Period." [Even if that means that Puget doesn't actually do any CETA-compliance for the next four years??] In a previous meeting Puget had stated how in certain sections of their base-case modeling they turn on the carbon-cost requirement, but in other sections of their base-case modeling they had turned off the carbon-cost requirement, and I asked "How can you do that, didn't Commissioners tell you in so many words that you *must* include carbon-cost in your base-case modeling? That doing so is not optional? That you don't get to pick and choose whether to use carbon-costs in your base-case modeling?" Puget's 'explanation': "This is how we are doing it. We like how we are doing it. Period."

5) Please require utilities to have a fully and correctly functioning audio visual and telephone meeting equipment at each IRP session. There needs to be financial penalties to utilities if they fail to do so. The amount of time and energy which is wasted over and over again by utilities failing to vet and have a functioning AV system *prior to the start* of each IRP meeting is truly insane. It is as-if the utility is deliberately wasting the time that has been allotted to the meeting, so that nothing meaningful can happen. It seems like this is simply a utility "ploy" to "run out the clock" at IRP meetings.

6) Please set a requirement for what percentage of IRP meetings actually happen as originally scheduled, all of: the original time, location, and subject matter. I suggest that a utility be required to show "good faith" by actually holding at least 90% of scheduled IRP meetings as originally scheduled, and that there be financial penalties if the utility does not do so. Further, if any meeting is canceled or changed without at least two weeks' notice, that there be financial penalties. Currently I suggest, constantly changing meeting content, dates, locations, or canceling meetings entirely is part of utility's ploys to insult participants, and to make their participation nearly impossible. For example, repeatedly, I have had to change or cancel a family vacation due to a meeting change, and then after doing so Puget just cancels the meeting outright, after having changed the date previously. And this has happened repeatedly. Staff and Commissioners certainly know from their own public meetings the importance of fairly announcing these things ahead of time, so that participants can schedule that meeting, and then to recognize the importance of everyone's time and energy by actually fairly holding that meeting. Utilities need to be held to professional standards in these matters, the IRP process needs to be recognized as being as important a part of utility practice as RFP, and that IRP meetings are not a time and place for continuous utility excuse-making.

7) Participants need a formal way to bring it to the attention of Commissioners and Staff when "things aren't going right" in the IRP cycle, so that problems can be addressed *prior* to the end of an IRP process, as we are experiencing now -- such that IRP process problems never actually get fixed, but rather just keep getting "kicked down the field" over and over and over again, IRP cycle after IRP cycle, decade after decade.

8) I suggest that *both* Participants and Utility need to have a say in the IRP process and "rules of the road" [meeting rules] -- not just Utility stating "Here's how it's going to work." There needs to be actual buy-in by both a majority of participants and the utility, not just the utility controlling everything. Perhaps Staff can also have a role in mitigating these "rules of the road" meeting rules, telling either utility, or participants "Hey, come on, you are being unreasonable right now." And frankly, Puget's

hiring of "professional facilitators" has not been particularly helpful -- they claim to be "neutral facilitators" -- but in practice they know full well that their paychecks are coming from Puget, that they are beholden to Puget, and that Puget can -- and does -- fire them on a moment's notice.

9) Please set a reasonable upper limit on how much of each meeting time utility "wastes" on "process" issues. Like say 10% of the total meeting time. Yes, meetings need to have some "process." But if all of the meeting time is spent on "process" and none is spent on actual "content," then again, this is simply another utility "ploy" to "run out the clock" and thereby prevent meaningful public participation.

10) Utilities, Commissioners, and Staff need to recognize that public participants come to these meetings with considerable expertise, that their time and effort is also "worth something" and that disagreements are part and parcel of the public process, and of a functioning democracy. That public participants are *equal* contributors to the IRP process, not "kindergarteners." That secrets are antithetical to a functioning democracy -- even when in some [rare] cases they are actually necessary. Not everything that a utility does or needs to do can be considered a "company trade secret" -- or public participation has been mooted. A "100% redacted" document is the same as not releasing the document at all -- so let's stop kidding ourselves. Utility is going to have to tell public participants some things that utility would prefer not to say, whether those secrets be part of a "ploy" or simply something the utility finds embarrassing. Utility needs to stop treating participants as-if they are kindergarteners, and Commissioners and Staff would do well to review the professional resumes of public participants if they don't understand the amount of time, effort and expertise we are ALL putting into the IRP process -
- ask us for our resumes if you don't understand this issue!

Thank you for your consideration,

James Adcock, Electrical Engineer