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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

From: [Court Olson](#)
To: [UTC DL Records Center](#)
Subject: Comment on UTC IRP rule making
Date: Friday, September 11, 2020 2:14:09 PM

Hello UTC officials.

Thank you for inviting comments on rules for the IRP process. My comments here are based on my experience over the past five years in attending PSE IRP meetings as a member of their technical advisory group. FYI, I've been a consultant on building design and construction for commercial building owners for many years. (See the footnote at the end of this memo for more on my background.) I'm interested in utility practices because in most cities across the country, buildings account for approximately half of our collective greenhouse gas emissions. Buildings also draw about three quarters of the power off of the electrical grid, and probably a similar portion of the natural gas out of pipelines. I'm also a PSE ratepayer.

• As our society attempts to make rapid transition in our collective habits to avoid perpetually worsening climate change, we need utilities to help us adapt at a rapid pace. If we are to be successful at curbing climate change, utilities must recognize the urgent challenge and they should welcome assistance. Though I have heard some rhetoric that suggests that PSE does get this reality, I honestly don't think that PSE recognizes the full urgency of the problem; nor do they appear to assume their significant obligation to be proactive in implementing rapid change away from fossil fuels. From my view, I don't have the sense that they truly welcoming help, at least not to the degree that they should. Even in recent months, there are indications that PSE continues to be most focused on preserving their current profit-making and fossil-fuels-based business model.

• I sincerely worry about PSE's business motives for the sake of humanity and the planet, and, also, for the sake of PSE ratepayers' expense in the long run. I believe that we (the public) must bring PSE to rapidly change its current business focus, and that we must offer them new tools and helpful mechanisms, so they can rapidly change while maintaining profitability.

• With appropriate rules change, more incentives, I'm hopeful that PSE would come much more motivated to rapidly transition off fossil fuels. The government, through some combination of new legislation and UTC rules, needs to step up and assist them in this transition in the following ways.

○ Provide incentive(s) for a utility to diminish peak power demand.

○ Require that utility efficiency improvement programs to offer greater incentives and to only pay incentives when a building's performance outcome is verified to have been lowered to a EUI level that is at least 35% below the latest CBEC

EUI average for the applicable building type.

<!--[if !supportLists]-->○ <!--[endif]--> Provide incentive(s) for fossil gas utilities to shrink demand by promoting customer conversions to electric equipment and appliances.

<!--[if !supportLists]-->• <!--[endif]--> Change the “cost effectiveness” formula in two ways:

<!--[if !supportLists]-->○ <!--[endif]--> Include the social cost of carbon;

<!--[if !supportLists]-->○ <!--[endif]--> Substantially lower the “discount rate” percentage, thereby decreasing the pressure for a quick payback in new, clean energy investments.

*Personal credibility footnote.

So that you might better appreciate my comments, here is some personal background in bullets form.

- I have three college degrees: B.S. Civil Engineering, B.S. Construction Management, M.S. CE & CM
- I have professional certifications in LEEDap, Design-Build, Construction Mgmt, and Value Engineering.
- I’m a consultant for Northwest commercial building owners –public and private.
- I’ve overseen design and/or construction of over three dozen commercial building projects, including the first LEED Platinum building in Washington, and a couple of major renovations.
- I’ve focused much of my work on deep energy efficiency.
- I’ve made a point of staying knowledgeable on energy efficiency in buildings through seminars and some courses, including the intensive Passive House design course.
- I’m pretty active in progressive “green building groups”, including Shift Zero, Seattle 2030 District, Emerald Cities, Passive House Northwest, Cascadia Green Building Council and others.
- I’ve had an active role in recent green building related legislation.

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My standard PS: Each day reflect on the climate future you are building for future generations.