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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Docket UG-210729
Anne Newcomb
October 25, 2021

Executive Director and Secretary Amanda Maxwell
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Consideration of whether to continue to use the Perpetual Net Present Value Methodology to calculate natural gas line extension allowances, Docket UG-210729

Dear Executive Director and Secretary Maxwell:

Thank you for the opportunity to provide written comments addressing whether natural gas utilities should continue to use the Perpetual Net Present Value (PNPV) methodology for calculating line extension allowances.

Please discontinue any incentives to expand natural gas (NG) infrastructure. Please do what is in your power to discontinue new gas lines or gas hookups. As we continue to move away from the use of fossil fuels and transform into the clean energy future in Washington State, it makes good sense to discontinue the addition of new gas lines. For many current NG customers it will most likely be difficult to transition major appliances quickly to electric. Most of us will want to, or need to due to financial constraints, wait until the appliance wears out. This could take years and may also be what is best in regards to emissions. Adding new gas customers at this point in time is not prudent.

I live in Issaquah where we are part of the King County-Cities Climate Collaboration (K4C) and currently working on a Climate Action Plan. We are relying on the WA UTC to continue to enforce and create strong rules to help us meet our GHG reduction goals of 25% by 2020 (not reached), 50% by 2030, and 80% by 2050. Since it began in 2012, the K4C has grown to 18 partners – King County, Bellevue, Burien, Issaquah, Kenmore, Kent, Kirkland, Lake Forest Park, Mercer Island, Normandy Park, Redmond, Renton, Sammamish, Seattle, Shoreline, Snoqualmie and Tukwila, and the Port of Seattle – who together represent 80% of the King County population. We all have the same GHG reduction goal.

NG is 87.0 - 98.0% Methane (CH₄). "Natural gas and petroleum systems are the second largest source of CH₄ emissions in the United States. Methane is the primary component of natural gas. Methane is emitted to the atmosphere during the production, processing, storage, transmission, and distribution of natural gas. Methane's lifetime in the atmosphere is much shorter than carbon dioxide (CO₂), but CH₄ is more efficient at trapping radiation than CO₂. Pound for pound, the comparative impact of CH₄ is 25 times greater than CO₂ over a 100-year period." United States Environmental Protection Agency (EPA)

Please use your power to stop the expansion of NG!

Thank you for considering my comment and for everything you are doing to help reduce GHG emissions!

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