

July 30, 2013

Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

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WASH. UT. & TP COMM

RE: Comments on Puget Sound Energy's Integrated Resource Plan

Dear Chairman Danner and Commission Members:

In reviewing a number of documents related to the Integrated Resource Plan being developed by Puget Sound Energy it seems that evaluation of what constitutes a "cost" is at the center of the ongoing debate. What are the "costs" of running a car using North Slope gasoline, compared to running a car on local roof top generated electricity, compared to running a car on eastern Montana coal generated electricity? "Costs" are much more than the dollar amount paid by a homeowner, business or governmental agency.

One of the costs required to be evaluated in an Integrated Resource Plan is the cost of risks associated with environmental effects including emissions of carbon dioxide. Most sources of energy conservation and generation have environmental risks and a carbon footprint. In most cases the risks are understood and there is a general agreement as to the risks. The one area that risks are greatest, least understood and least agreed upon is in the burning of coal.

In a letter signed by the King County Executive and a number of local mayors my concerns are well stated about the generation of electricity by burning coal at the plant in Colstrip Montana:

"If the full costs, uncertainties, and risks of Colstrip's continued operation are considered, it is likely that the combined costs of complying with environmental impacts (including impacts related to air pollution, coal ash, and groundwater), upgrading plant technology and infrastructure, and likely regulation of carbon pollution would be greater or equal to cleaner alternatives such as expanded energy efficiency, renewable energy, smart grid and other approaches."

Every strategy should be evaluated in the PSE's IRP to reduce and eventually eliminate coal as a source of energy for our region. The economic and environmental costs of reliance on coal are too great and are unsustainable.

Sincerely,



David Kappler
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