

Higgins, Joni (UTC)

From: Sierra Club <information@sierraclub.org> on behalf of Harry Romberg <hbromb@aol.com>
Sent: Thursday, August 22, 2013 4:23 PM
To: UTC DL Records Center
Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 22, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO₂ non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to verify or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plan and have them incorporate the true cost of coal.

Sincerely,

Harry Romberg
11538 17th Ave NE
Seattle, WA 98125-5112
(206) 365-9302

Whipple, Amanda (UTC)

From: Sierra Club <information@sierraclub.org> on behalf of Diane Moan <dianemoan@gmail.com>
Sent: Thursday, August 22, 2013 11:54 PM
To: UTC DL Records Center
Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 23, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars of dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping the plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in place, federal or state action is anticipated in the near future, and is almost certain to occur with the next two presidential administrations. President Obama noted in a recent speech about climate disruption and carbon pollution: "We limit toxic carbon dioxide emissions from power plants, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing several legal challenges on coal ash and the contamination continues.

No consideration of potential SO₂ non-attainment costs and underestimation of other air quality liability costs for compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years will be increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to verify or refute PSE's methodology. In some cases PSE has not justified why its assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios tested showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's plan and have them incorporate the true cost of coal.

Sincerely,

Diane Moan
12517 26th Ave NE
Seattle, WA 98125-4301
(704) 651-4126

Whipple, Amanda (UTC)

From: Sierra Club <information@sierraclub.org> on behalf of Bea Soss <bbbeatricediane@voila.fr>
Sent: Friday, August 23, 2013 7:25 AM
To: UTC DL Records Center
Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 23, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and expensive coal plant for another 20 years.

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No consideration of potential SO₂ non-attainment costs and underestimation of other air quality liabilities from compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years will be increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to verify or refute PSE's methodology. In some cases PSE has not justified why its assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that were modeled showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's Resource Plan and have them incorporate the true cost of coal.

Sincerely,

Bea Soss
1128 W 19th Ave
Spokane, WA 99203-1137

Whipple, Amanda (UTC)

From: Sierra Club <information@sierraclub.org> on behalf of sharon olson <g@aol.com>
Sent: Friday, August 23, 2013 7:25 AM
To: UTC DL Records Center
Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 23, 2013

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No consideration of potential SO₂ non-attainment costs and underestimation of other air quality liabilities from compliance with federal haze rules and new federal air toxics rules.

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PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that were modeled showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

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Sincerely,

sharon olson
37314 374th
roy, WA 98580

Whipple, Amanda (UTC)

From: Sierra Club <information@sierraclub.org> on behalf of David Kendall <davidrun2b@aol.com>
Sent: Friday, August 23, 2013 5:24 AM
To: UTC DL Records Center
Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 23, 2013

Utilities and Transportation Commission (UTC) WA

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2013 AUG 23 AM 9:23

UTC DL RECORDS CENTER

Sincerely,

David Kendall
23025 74th Ave W
Edmonds, WA 98026-8502
(425) 582-9434

Whipple, Amanda (UTC)

From: Sierra Club <information@sierraclub.org> on behalf of Evan Guest <vinyl_destination@msn.com>
Sent: Friday, August 23, 2013 3:01 PM
To: UTC DL Records Center
Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 23, 2013

Utilities and Transportation Commission (UTC) WA

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Sincerely,

Evan Guest
4118 N Normandie St
Spokane, WA 99205-1044