From:

Sierra Club <information@sierraclub.org> on behalf of Natalie Carney

<nbgc@live.com>

Sent:

Wednesday, August 28, 2013 9:28 PM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 28, 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 very 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.

Natalie Carney 3252 Cape George Road Port Townsend, WA 98368-3058 (360) 344-4060

From:

Sierra Club <information@sierraclub.org> on behalf of Rich Easter <mrwillys@aol.com>

Sent:

Thursday, August 29, 2013 6:29 AM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 29, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

We support the use of clean coal

Sincerely,

Rich Easter 114 Homer Ln Toledo, WA 98591-9458

From: Sierra Club <information@sierraclub.org> on behalf of Shirley Rivas

<sarnpt@gmail.com>

Sent: Thursday, August 29, 2013 10:29 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 29, 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 very 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.

Shirley Rivas 707 Q St Port Townsend, WA 98368-3827 (360) 390-4919

From:

Sierra Club <information@sierraclub.org> on behalf of Steve Lebens

<stevelebens@gmail.com>

Sent:

Thursday, August 29, 2013 10:29 AM

To:

**UTC DL Records Center** 

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 29, 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 very 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.

Steve Lebens 3402 41st Ave SW Seattle, WA 98116-3448 (206) 935-3062

From: Sierra Club <information@sierraclub.org> on behalf of Chelsea Sparks

<blue.thread@hotmail.com>

Sent: Thursday, August 29, 2013 2:44 PM

To: UTC DL Records Center Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-129767)

Aug 29, 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 very 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.

Chelsea Sparks 5411 96th Avenue Ct W University Place, WA 98467-1313