

February 4, 2021

RE: Dockets UE-200304 and UG-200305

Title: PSE has improved on public participation, but meaningful participation is still lacking.

Dear Washington Utilities and Transportation Commissioners:

I am a member of the public, a PSE rate-payer, and a person with dire concerns about the future of humanity due to our climate emergency. I submitted public comments on PSE's 2017 IRP, was a member of PSE's Technical Advisory Group for the aborted 2019 IRP, and am currently a participant in PSE's 2021 IRP.

The human mind is not the rational organ we want to believe it is. Most of us operate on information learned long-ago and have a difficult time adjusting our thinking to incorporate new ideas, especially if that new information does not come from people we interact with commonly.

PSE employees, like employees of many utilities, tend to listen to themselves and people who run similar utilities and think like them. They need assistance to engage in "outside the box" thinking, and they need strong incentives to change direction, particularly in our current climate crisis. To help utilities make unprecedented changes with unprecedented speed, the State Legislature stepped in to provide legislative requirements and checks on utility decision-making. One component of this process is providing meaningful input from outside the utility: from the UTC and the public. Both entities are essential for the process to work.

There are enormous changes and opportunities happening now that can have tremendous benefits for those in the utility industry. Typical utilities are not ideally equipped to learn of these on their own or to figure out how to integrate them seamlessly into their systems. PSE, a fossil fuel dominant company with a bias and culture in favor of fossil fuels, is poorly positioned to integrate new resources efficiently, possibly leading to higher rates and/or stranded assets.

Public input is one essential way to bring their attention to new ideas, such as making hydrogen from excess green energy, and to remind them of not so new ideas that they have dismissed in the past, such as incorporating major energy-efficient retrofits in commercial buildings.

Talented people have been providing free and invaluable technical input to our state's utilities through the process of public participation for many years. They see many options that utilities should be considering and have expertise the utilities lack. PSE has a history of ignoring this sound technical advice except when it agrees with what PSE already wants to do. These members of the public deserve more than lip-service. If public input is ignored and does not result in needed changes, utilities could inadvertently continue to put ratepayers, the economy of the NW, and the future of our climate at risk.

PSE improved their process of public participation in the 2021 IRP compared to the 2019 IRP. For example, all members of the public may attend and participate in meetings for this IRP round. In the 2019 IRP, the public was able to attend meetings, but only members of PSE's Technical Advisory Group (TAG) could participate, and TAG members were limited to two people per organization and needed PSE's pre-approval. Also, all meetings are recorded and available on-line, so they can be viewed even if you can't attend live.

One problem with the current system is that the meetings, while open to the public, are not widely advertised to the public. Another problem is that PSE is only holding technical meetings this time. During the 2019 round, most meetings were technical and limited to TAG participation, but other meetings were held that were more appropriate for a non-technical audience. No such general meetings were held this time, so PSE did not receive input on concerns from typical rate-payers.

Another improvement during the 2021 IRP round has been the incorporation of some methods from the International Association of Public Participation (IAPP or IAP2). Some of PSE team members were trained by IAP2. PSE incorporated the system and informed us of the level of public participation they used for each topic they selected for public webinars. They used three IAP2 levels: **inform** ("provide the public with

IAP2 Spectrum of Public Participation

IAP2 developed The Spectrum of Public Participation to help groups define the public's role in any public engagement process. The Spectrum is quickly becoming an international standard.

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions"), **consult** ("obtain public feedback on analysis, alternatives and/or decisions"), and **involve** ("work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered"). While the use of this process was an improvement over previous years, it did not result in an appropriate level of public participation. PSE primarily relied on IAP2 levels of involvement that were too low for the public to have meaningful input.

For the 2021 IRP, PSE selected the **inform** level for many topics. This level is appropriate to introduce people to a topic and might be appropriate for meetings for general rate-payers to become informed, but it is not remotely close to what PSE should be proposing for most technical meetings.

PSE selected the **inform** level of involvement for topics that have been controversial in the past (controversial in the sense that stakeholders had significant concerns that PSE was proceeding in the wrong direction and PSE dismissed the concerns) and for which PSE appeared to have little intention of considering public input. This was evident in Webinars on calculations for the social cost of carbon and upstream methane. For example, in Webinar 5 (July 21, 2020), PSE presented essentially identical information to what they presented in TAG Meeting 6 (May 29, 2019). Many people present in 2020 were also present in 2019 and had been informed of this content, had given PSE feedback, and had been ignored by PSE. PSE's response, when I asked why **inform** was an appropriate level for this topic in 2020, was:

Thank you for your comments. Concerning PSE's decision to present upstream emission as an "inform" level of public participation per IAP2, this is the appropriate level for an input to the 2021 IRP. (page 2, PSE's Social Cost of Carbon Feedback Report)

This example demonstrates that PSE did not allow an appropriate level of public involvement in its IRP process, and they did not explain why they thought **inform** was an appropriate level. The fact that the public was still feeling a strong need during Webinar 11 in December 15, 2020 to make PSE aware of their errors in the calculations confirms the problem of having PSE use a level of **inform** inappropriately to avoid meaningful input. To have members of the public put so much time and energy into participating in a utility's public process and to have the utility simply inform us of their potentially poor or erroneous decisions is unacceptable and leads to unnecessary misunderstandings.

Another example of a problem with their process of using IAP2 for public participation occurred on Oct. 14, 2020 during Webinar 8 about Gas sensitivities. This was one of only four times PSE said they would use the higher public participation level of **involve**. The slides PSE distributed before the meeting indicated they would involve us by asking what we thought about possible gas sensitivities during the Webinar. Some of us spent time considering this before the meeting and wanted to discuss it and to hear what other

stakeholders thought. Instead of giving us a chance to do this, when the time arrived for the discussion, Elizabeth Hossner, Resource Planning & Analysis Manager for PSE, changed the topic and said, "We're actually asking, ...is it still necessary to be running these different sensitivities?" She also gave us essentially no time to respond to this unexpected question. Below is a Feedback comment describing this webinar from Josh Rubenstein, a stakeholder (pg 237 of the PSE 2021 Draft IRP Appendices):

To both PSE and the facilitators, the fact that you told the public that we were "involved" in the October 14th IRP meeting stretches the imagination. After three hours of "inform" we got to the one slide with "involve" level of IAP2 participation, at which point PSE said that based on the data they had presented they did not believe that further sensitivities analysis needed to be done on the gas forecasts. In other words, PSE asked us to agree that public involvement was unnecessary at the only point in their presentation where public involvement was planned.

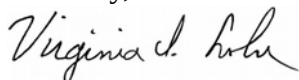
PSE's response to him was unrelated to the issue Rubenstein raised of PSE deciding before the meeting that they would not involve us, even though they had said they would:

Thank you for your thoughtful comments and suggestions concerning PSE's 2021 public participation process. PSE agrees that for future meetings we will consider placing, "involve" level topics as priority on the agenda to provide for more opportunity for engagement. PSE has decided the level of engagement for each topic to the level that we can commit concerning that topic.

Such responses from PSE do not meet the *involve* standard to "ensure that public concerns and aspirations are consistently understood and considered." In this same meeting (Webinar 8), I stated that gas sensitivities were needed, and the response from PSE was not to agree to let us actually discuss them, but: "Thank-you." PSE did say we could send in written comments. PSE's response to written comments on gas sensitivities was: "Thank you for your comments and recommendations." The *involve* standard also says "we will provide feedback on how public input influenced the decision." Clearly their response to written comments did not come close to meeting that standard. They may have unilaterally incorporated some of what we had suggested, but they never actually gave us a chance to discuss potential sensitivities or learn what sensitivities they would include or why.

The 288 pages in the Appendix on Public participation show that PSE put many hours into the process, but quantity is not the same as quality. The Appendix is full of other examples of ways PSE ignored meaningful public input. My biggest concern with PSE's lack of true responsiveness to public concerns is that they may take risky actions that result in unwarranted, imprudent, and unnecessary costs for rate-payers, while jeopardizing the very future of this planet. I don't think they are doing this because they are evil; I believe their thinking is flawed from having been too close for too long to what worked for utilities in the past. They need to invest more time in being truly innovative so they, their investors, and the public thrive into the future. PSE should *collaborate* with stakeholders. We want them to be successful into the future, so we can have a successful future too. Please do what is necessary to make this happen.

Sincerely,



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