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Subject: Comments on PSE Gas IRP - UG-200305 (Natural Gas)

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To whom it may concern,

The City of Seattle's Office of Sustainability and Environment would like to comment on the draft 2021 PSE Natural Gas IRP for your consideration.

Our feedback is as follows:

- The PSE gas IRP analysis does not appear to adequately take building electrification and codes/standards into serious consideration and is missing from section 4-22. This section states that the analysis (Appendix I) will be completed for the final April, 2021. This does not provide adequate time for stakeholder review to ensure the following are incorporated into the sensitivity analysis.
 - WA State Clean Energy Strategy (2021) which was recently releases, identifies building electrification as a necessary strategy needed to help meet state greenhouse gas emission reduction goals.
 - WA state requires that new buildings will need to be net zero by 2031.
 - The recently enacted Seattle 2018 Commercial Energy Code prohibits gas for space heating in all buildings as well as water heating in most buildings. We expect King County and other jurisdictions to follow with similar energy codes this year.
 - WA State Clean Buildings Act requires existing buildings 50k sq feet and above to meet energy use intensity targets starting in 2026, with a voluntary incentive program starting in fall of 2021.
- There is a lack of analysis/transparency of renewable natural gas in the resource mix and what this would mean to costs and social cost of greenhouse gas adder. In section 4, page 4-13, PSE states "*this IRP does not analyze hypothetical RNG projects that would connect to NWP or to PSE's system and displace conventional natural gas that would otherwise flow on NWP pipeline capacity.*" Since PSE has recently signed a contract with Klickitat PUD for renewable gas for 20 years starting in 2023, we feel it is important to include that resource in the IRP as it is contracted and not hypothetical.
- Page 4-24 Gas Supply and Pipeline Transportation: This section focuses narrowly on disruptions to gas transportation infrastructure being a risk to reliability. The section does not elaborate on how this risk might translate to higher costs – other than "prices may continue to be more volatile." The BC explosion in 2018 resulted in a rate tariff to recover the costs.
- Page 6-16, 6-21 Gas demand forecasts: Include DSR only through 2021. Effect of conservation on energy demand is incomplete. Also, given that the Clean Buildings Act requires PSE to pursue all cost-effective gas conservation (and since adding the SCGHG has pushed more measures to be cost-effective), it would be expected that conservation would have a bigger effect on projected energy demand. Also, gas demand forecasts do not seem to include codes and standards for new construction, anticipated state GHG reduction policies, local-level carbon reduction policies, or effects of the state building performance standard. Given these existing and anticipated policies, we do not understand the annual gas demand increases in the forecast illustrated on page 6-17.

Thank you for the opportunity to comment and I look forward to participating in upcoming IRP webinars.

Sincerely,



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