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From: donmarsh@cense.org
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Subject: Comments on UE-191023 and UE-190698

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Dear Commissioners and Staff,

The non-profit organization CENSE (Coalition of Eastside Neighborhoods for Sensible Energy) appreciates the opportunity to comment on Dockets UE-191023 and UE-190698 regarding rule revisions for Integrated Resource Plans (IRP) and the Clean Energy Implementation Plan (CEIP).

Our organization has participated in the development of the past three IRPs for Puget Sound Energy. We have offered suggestions and criticism that have resulted in significant changes to the content of the company's IRPs (for example, the inclusion of a whole chapter on transmission planning in PSE's 2017 IRP). Consequently, we are concerned about rules that might limit our participation in the future. We hope the Commission's final rules will preserve the public's ability to understand and participate in significant discussions about our energy future.

The draft rules appear to narrow **public participation** to advisory groups (it's not clear which advisory groups are included). This is not acceptable, because PSE controls membership in advisory groups. For example, as the 2019 IRP Technical Advisory Group was being formed, a PSE representative called the president of our organization to inform him that he would not be allowed as a member of the committee. The company said only "industry professionals" would be granted membership, and our president unfortunately lacked the necessary qualifications. PSE relented after our president submitted a formal application with professional qualifications and evidence of past contributions. However, others might have been turned away under these circumstances.

PSE also exerts some control over advisory group discussions. On numerous occasions, advisory group members have found it difficult to express opinions when they were seen as "taking too much time" in a busy meeting, or if the "topic was already covered sufficiently." The meeting agenda is sometimes organized so controversial topics are placed at the end, where fatigue and time pressure restrict the ability of advisors to comment. PSE frequently overpacks the meeting with its own presentations, including minutiae of little practical importance, thereby limiting time for discussion by participants. For example, the November 16th webinar includes a "Safety Moment" where participants are exhorted to wear seat belts, obey speed limits, and avoid driving under the influence of alcohol and drugs. While we appreciate the company's concern, most advisors do not engage in

these risky behaviors. The time spent on these safety advisories are subtracted from advisers' speaking time.

While some of these problems are not easy to remedy, the solution is not to place even more pressure on advisory groups by limiting the public's ability to participate. If an issue arises that is of great significance to the public, but only passing interest to the designated advisors, what recourse does the public have to raise these issues?

We are also concerned about draft rules related to **data disclosure**. The public can make informed comments only if they can understand the assumptions utilities are using to reach their conclusions. Transparency requires that data be released in a comprehensible format, not just a data dump in "native format." Native formats can only be interpreted if the public has access to the software the utilities are using, like Aurora and Plexos. These are complicated software programs that require experts to run them, and they can cost thousands of dollars to license for just a month. These requirements surpass the public's ability.

The public is not asking to see every variable or parameter. There are certain values and assumptions that are of key interest. For example, the 2021 IRP stakeholders have repeatedly asked PSE what percentage of upstream methane leakage the company is assuming in calculations regarding the Social Cost of Greenhouse Gases. This is a simple assumption that PSE will not disclose. If PSE released megabytes of "native format" data, the public might be unable to find the value of this parameter in the haystack. We therefore ask that all parameters deemed relevant by advisory groups or the public be released in an "easily accessible format."

In some cases, a parameter might need to be restricted for security, privacy, or competitive reasons (although most IOUs are monopolies without serious competitors). In these cases, the company could require an NDA to prevent wider disclosure. If the utility can make a compelling argument why public disclosure harms the public interest, we would be willing to sign a reasonable NDA to access the information. This is common practice in other states, and there is no reason the same protocol wouldn't work in our state.

We ask the Commission to adopt clear rules that preserve the public's right to participate and to be informed through adequate data disclosure.

In addition to public participation and data disclosure, we are mystified as to why PSE continues to treat the Social Cost of Greenhouse Gases as a "fixed cost" in most of its scenarios and modeling. PSE has defended this practice, claiming it produces an even better outcome for the environment than more realistic "variable cost" modeling. However, we view this as an accounting trick that may increase other costs on ratepayers or the health of communities living near gas generation facilities. PSE's "fixed cost" method is difficult to understand and models an alternate universe that we do not live in. We prefer PSE to use the most realistic assumptions in its models, and then we can mitigate environmental and societal harm in other ways, if necessary.

We ask the Commission to require "variable cost" modeling in all calculations that relate to the Social Cost of Greenhouse Gases.

Finally, the draft rules require only one scenario that anticipates future climate change. Most scientists agree that climate change is occurring and is likely to continue for the foreseeable future. The main question is one of degree. If humanity isn't successful in curtailing emissions of greenhouse gases, climate change may become very uncomfortable in the quarter century timespan studied in next year's IRPs. If international efforts are successful in reducing emissions, climate change may be somewhat mitigated, but past emissions will continue to have an impact on the global climate for many decades. The most conservative approach would be to study scenarios contemplating low, medium, and high degrees of climate change. A theoretical scenario could be included that assumes no climate change, but very few people would believe that is the most likely future.

We ask the Commission to require utilities to model a range of climate change futures, with “no climate change” recognized as the least likely outcome.

Thank you for allowing us to comment on this important rulemaking.

Sincerely,

Don Marsh, President
CENSE.org