



Statement on the Puget Sound Energy
2017 Integrated Resource Plan
January 19, 2018

The Seattle 2030 District is a private-public partnership that is working to dramatically reduce environmental impacts of building construction and operations through education and collaboration across every sector of the built environment in downtown Seattle and other local areas of rapid commercial development. Among its goals, the District seeks to reduce energy use and CO₂ emissions from transportation by 50% by the year 2030, and for new construction and major renovations, the goal is carbon neutrality by the year 2030. The District has over 135 member organizations - property developers, owners and managers, architecture and engineering firms, local governments, and other non-profits. Over 50 million square feet of real estate has been committed to meet the goals.

The 2030 District's goals are consistent with efforts to promote massive energy efficiency in commercial and multifamily buildings. We also support hydro, wind, and solar as carbon-free energy sources that can power and heat our buildings and fuel our cars and transit. Electric storage capacity in the form of utility-scale batteries or plug-in EVs can also be tapped when needed. What is no longer necessary are investments in coal and in natural gas distribution and combustion at the grid and building level. We welcomed the change to the latest Seattle energy code, which severely disadvantaged fossil fuel combustion equipment. Innovative approaches such as this will help us reach ambitious state, county and city climate goals.

In its 2017 Integrated Resource Plan (IRP), Puget Sound Energy still envisions a role for coal and gas as it looks 20 years out. Replacement of the coal-fired Colstrip power plants with 100% renewable energy and energy conservation is feasible now, as stated in the 7th Power Plan from the Northwest Power & Conservation Council. Using natural gas engenders price volatility with fuel costs prone to dramatic price swings while renewable energy has predictable costs over the long life of most Power Purchase Agreements. In addition, the expected pricing of carbon in Washington State would add to our members' costs as well as it gets factored into electricity and gas rates.

To address load increases and peak demand needs, PSE would be better served investing in programs that encourage deep energy efficiency in the commercial and multifamily sectors, similar to those being developed by Seattle City Light around payments for demonstrated performance and energy efficiency as a service. Both mechanisms focus on the whole building, incentivize comprehensive measures, and get deeper efficiencies with less paperwork and money. Both have been tested in 2030 District member buildings and have demonstrated their ability to contribute to City Light's efficiency targets. When they are rolled out a greater scale, we expect a number of 2030 District members to enroll.

We look forward to actions by the UTC that will require more innovation and environmental stewardship from PSE.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Susan Wickwire". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan Wickwire
Executive Director