

Washington Utilities and Transportation Commission Dockets UE-170033 and UG-170034

Dear commissioners Danner Rendahl and Balasbas ,

August 31, 2017

Thank you for considering my comments.

The mission of the WUTC is to protect the people of Washington by ensuring that PSE services are safe, available, reliable and fairly priced. Today, I would like to talk about two of these protections, safety and fair pricing.

Here are quotes from PSE's own website:

"At PSE, we're putting our energy into clean power solutions that help our customers and the environment."

"Doing smart things for our customers and the right thing for our planet is what PSE is all about."

"One of the ways Puget Sound Energy demonstrates its commitment to the environment is by providing our customers with reliable and ecologically sustainable energy services."

These statements do not make me feel safe. PSE advertises environmentally sustainable values to their rate holders while being held by Macquarie Consortium, not only the largest Australian investment bank but also Macquarie is one of the largest gas production and distribution companies in the US. Conflict? I think so.

PSE claims to be concerned about the environment while they run and operate Colstrip, one of the largest CO₂, SO₂ and mercury emitting coal plants in the US! EPA reports that the 2,094-megawatt Colstrip Generating Station emits nearly 15 million metric tons of CO₂ per year, placing it among the top 5 carbon-producing power plants in the United States. PSE owns 32.3% of Colstrip and is responsible for emitting about 5 million metric tons of carbon per year from this plant.

Sixty percent of our energy comes from Carbon sourced fossil fuels in a region that has a surplus of hydropower and resources prime for harnessing wind and solar. Is this because it is cost effective? I don't think so.

When talking about cost of electricity, we must talk about environmental cost and factor in climate change. Our least cost plan, must require that environmental externalities, especially the irreversible environmental costs of climate change, be quantified and explicitly weighed during the resource selection process.


Regarding monetary cost, first, we have to consider carbon taxes and future limitations on using fracked gas within our great State and beyond this current Federal administration that would drive up the cost of LNG. Without a doubt, these costs would be passed on to us, the rate payers.

Second, as you may be aware, the Regional Greenhouse Gas Initiative (RGGI) was the first mandatory market based program in the United States to reduce greenhouse gas emissions. The RGGI established a regional cap on the amount of CO₂ pollution that power plants can emit by issuing a limited number of trade-able CO₂ allowances. The RGGI is a cooperative effort among a region of nine states (Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont) to cap and reduce CO₂ emissions from the power sector. RGGI compliance obligations apply to fossil-fueled power plants 25MW and larger within the nine-state region.

In a July 2016 RGGI outcomes report it shows that electricity prices across the 9 state region decreased by 3.4% between 2008 and 2016, while in states not establishing CO₂ caps, electricity prices increased an average of 7.2%.

I looked on PSE's website and found electricity price summary reports from 2008 and 2016 the approximate range of the RGGI report. Prices have increased 14.81%! This in an economy where oil and coal have dropped substantially.

PSE must be held accountable to the mission of the WUTC. Let's keep our utilities safe. Let's require the price of externalities be considered and consider the high financial cost of carbon sourced electricity. We have many viable lower cost renewable options to coal and natural gas. Close Colstrip 3 and 4 before 2025, skip LNG and go straight to renewable resources. It is what we, the ratepayers want! It is what the planet and our future generations need!

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PSE Customer
Vashon, Washington and Ferndale, Washington.
Vashon Climate Action Group.



SUMMARY OF TOTAL CURRENT PRICES - ELECTRIC

HOW A CUSTOMER BILL IS CALCULATED

RESIDENTIAL SERVICE

SCH 7

For a customer who used 1,000 kWh during one month (assuming 30 days of service).

BASIC CHARGE		\$	7.87
ELECTRICITY 1,000 kWh			
Tier 1 First	600 kWh	@ \$ 0.097543	\$ 58.53
Tier 2 Remaining	400 kWh	@ \$ 0.116365	\$ 46.55
ENERGY EXCHANGE CREDIT	1,000 kWh	@ \$ (0.006794)	\$ (6.79)
JEFFERSON PUD SALE CREDIT	1,000 kWh	@ \$ -	\$ -
OTHER ELECTRIC CHARGES AND CREDITS	1,000 kWh	@ \$ 0.000074	\$ 0.07
		SUBTOTAL \$	106.23

State Utility Tax included in above charges
Effect of city tax ** (Varies by municipality)

Basic Charge	Basic Charge (Sch 7)
Includes:	Expedited Rate Filing Adj (Sch 141)
Energy Charge	Energy Charge (Sch 7)
Includes:	Low Income (Sch 129), Property Tax Tracker (Sch 140), Expedited Rate Filing Rate Adj (Sch 141) Revenue Decoupling Adj Mechanism (Sch 142)
Other Electric	Power Cost Adjustment Clause (SCH 95)
Charges and Credits	Federal Wind Power Credit (SCH 95A)
Includes:	Electric Cons. Program Charge (SCH 120) Merger Credit (SCH 132) Renewable Energy Credit (SCH 137)

*For Schedule 7, the Basic Charge covers meter reading, billing and other related fixed costs.
** This is the effect of tax assessed on Puget Sound Energy by your city government. This rate will vary by municipality.

Handwritten calculations:

$$\frac{106.23}{1000 \text{ kWh}} = 0.1062$$

$$\frac{1062}{10925} = 1.1481$$

14.81%



Electric Summary Sheet No. S-1
 Effective Date 11/01/2008
 Issued Date 11/01/2008

SUMMARY OF TOTAL CURRENT PRICES - ELECTRIC

HOW A CUSTOMER BILL IS CALCULATED

7 RESIDENTIAL SERVICE

For a customer who used 1,400 kWh during one month (assuming 30 days of service).

Schedule 7 is referred to on customer bills as one of the following Rates:

07-NFC-E 07E 17-NFC-E 17E
 27-NFC-E 27E 37E 47E

BASIC CHARGE

ENERGY CHARGE	kWh used		\$	7.00
	First	1,400 kWh		
	Remaining	600 kWh @	\$ 0.084772	\$ 50.86
		800 kWh @	\$ 0.102581	\$ 82.06
		1,400 kWh @	\$ 0.003137	\$ 4.39
ELECTRIC CONSERVATION PROGRAM		1,400 kWh @	\$ (0.009135)	\$ (12.79)
ENERGY EXCHANGE CREDIT		1,400 kWh @	\$ -	\$ -
POWER COST ADJUSTMENT		1,400 kWh @	\$ (0.001404)	\$ (1.97)
WIND POWER PRODUCTION CREDIT				

Subtotal \$ 129.55
 City Tax (if any)
 Total Bill \$ 129.55

Handwritten notes: 129.55 / 1400 = 0.0925



January 15, 2016

Carl Daly
 Air Program Director
 United States Environmental Protection Agency
 Region VIII
 1595 Wynkoop St.
 Denver, CO 80202-1129

RE: Sources within Montana Subject to 40 CFR 51 Subpart BB – Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS.

Dear Mr. Daly:

As you are aware, the U.S. Environmental Protection Agency (EPA) promulgated a revision to the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO₂) on June 2, 2010 (75 FR 35520). Pursuant to 42 USC §7407(d)(1), Congress directs EPA to designate all areas of the Country as nonattainment, attainment, or unclassifiable with respect to a new or revised NAAQS. On August 21, 2015 EPA finalized and published the Data Requirements for Characterizing Air Quality for the Primary SO₂ National Ambient Air Quality Standards (NAAQS) at 40 CFR 51.1200 (Subpart BB). Specifically at 40 CFR 51.1200(2) an applicable source is defined as a stationary source that has actual annual SO₂ emission data of 2,000 tons or more or, has been identified by an air agency or by the EPA Regional Administrator as requiring further air quality characterization. Table 1 below is the 2014 Emission Inventory of all SO₂ sources within Montana.

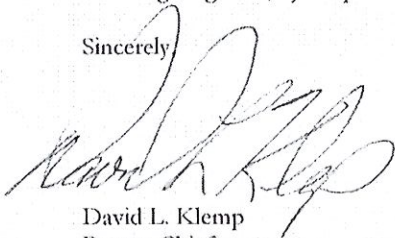
TABLE 1

Montana Actual SO₂ Emissions		
<i>(source: Montana 2014 annual emissions inventory/Annual Emissions Reporting Requirement or AERR)</i>		
Emissions Source	Emissions (CY2014)	DRR Triggered? (2000 ton/yr*)
Rocky Mountain Power	382	N
Graymont Western US	175	N
Calumet Montana Refining Co.	32	N
USFS Malmstrom AFB	2	N
MDU – Miles City	0.038	N
MDU – Glendive	0.36	N
Oneok – Baker Plant	97	N
Holcim US	18	N
Ash Grove Cement Co.	362	N
Sidney Sugars	51	N
MDU – Lewis and Clark	1,046	N
CELP (Rosebud Power)	1,165	N
Talen Colstrip Units 1-4	10,110	Y
Western Sugar – Billings	123	N
Phillips 66 – Billings	88	N
CHS, Inc. – Laurel	239	NA – Existing NAA
ExxonMobil – Billings	659	N
MSCC - Billings	1,436	N
Talen JE Corette – Billings (offline)	1,433	NA – Existing NAA and permanently offline
YELP – Billings	1,525	N

Table 1 above clearly shows that Montana has only one source subject to the Data Requirements Rule (DRR), the Talen Energy coal fired electrical generating unit located at Colstrip in Rosebud County. This facility consists of 4 coal fired boilers permitted as a single source. The Talen facility is well over the 2,000 ton per year threshold established in the DRR. Montana will select the appropriate methodology for determining Rosebud County's SO₂ NAAQS designation and will inform EPA of its decision on or before July 1, 2016 as required in the DRR.

If you have any questions regarding this action, please contact Stephen Coe, the Department's Air Quality Bureau Senior Planning Engineer, by telephone at (406) 782-2689 x 209 or by email at scoc@mt.gov.

Sincerely



David L. Klemp
Bureau Chief
Air Quality Bureau

Enclosure

cc: Adam Clark, Air Quality Planner, US EPA Region 8
Tom Livers, Director, Montana Department of Environmental Quality
Annette Williams Technical Support Services Program Manager, Air Quality Bureau MT, DEQ
Stephen Coe – Senior Planning Engineer, Air Quality Bureau, MT DEQ