



8/13/21

Mr. Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: UTC Docket U-210553

Dear Mr. Johnson,

The recent UN IPCC 6th report was released on Monday, and it is very clear: humanity has heated the climate to at least a 100,000 year high. All the warming is caused by human influence, and we must rapidly reduce emissions to net zero by 2050 in order to stabilize our climate. “Unless there are immediate, rapid, and large-scale reductions in greenhouse gas emissions, limiting warming to 1.5°C will be beyond reach,” said Ko Barrett, senior advisor for climate for NOAA’s Office of Atmospheric Research and one of three IPCC vice-chairs.

The City of Seattle has a goal to be carbon neutral by 2050. In Seattle, 35% of carbon emissions are from the building sector and that figure is rising. Between 2016 and 2018, we saw an 8.3% increase in building emissions. The residential sector accounted for the majority of those emissions due to an increase in natural gas use¹.

Achieving our climate goal is a critical but challenging task. Despite our efforts to reduce carbon emissions through local policies and programs, we need statewide policies and commitments from legislators, regulators, and the gas utilities to decarbonize fossil gas in buildings as quickly as possible.

We appreciate the UTC embarking on an examination of pathways to decarbonize natural gas (docket U-210553), which will inform future legislative policies. We recognize that the budget provided to do this work is limited and that the intent is to provide practical and feasible pathways and recommendations to the State Legislature. In addition to the more obvious impacts such as rates, electric grid infrastructure, reliability, and energy supply, we recommend the following considerations be included in the examination scope to ensure a clearly articulated report to the legislature that includes comprehensive societal benefits, costs, and risks and that is informed by existing third-party reports and data:

- **Health:** Work with the Department of Health (DOH), Ecology, Clean Air Agencies, and other relevant departments, to identify indoor and outdoor air-quality impact findings²; include related health costs in cost/benefit analysis; identify the health impacts of gas combustion in homes, particularly children’s health.³ Include data on urban heat island impacts, particularly for highly impacted communities including BIPOC households, households with lower incomes and seniors.
- **Extreme Heat:** More frequent and more extreme heat waves that our state experiences must be factored into this report. Extreme heat and wildfire smoke due to climate change will continue, and will disproportionately impact vulnerable seniors, households with existing medical conditions, and households living in geographies

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¹ [Understanding Our Emissions - Environment | seattle.gov](https://seattle.gov/understanding-our-emissions-environment)

² [Climate Change in Washington State: Washington State Department of Health](https://www.wa.gov/climate-change-in-washington-state)

³ [Study highlights high cost of fossil fuel pollution on children's health -- ScienceDaily](https://www.sciencedaily.com/news/health-environment/2018/08/study-highlights-high-cost-of-fossil-fuel-pollution-on-childrens-health-180821.htm)

with already poor air quality. Adoption of measures such as high-efficiency heat pumps will be critical in reducing heat-related stress, hospitalizations, and deaths. Use available data from the Department of Health-Heat Stress WA Tracking Network⁴ and asthma data to identify costs, risks and impacts to vulnerable populations.

- **Safety:** Include analysis of impacts to first responder resources such as fire departments when responding to natural gas leaks and explosions, and include the costs borne by local jurisdictions in any cost/benefit analysis.
- **Gas Distribution Assets:** Analyze age and needed maintenance of gas distribution pipelines so that recommended decarbonization pathways factor in and prioritize areas in the distribution network that need upgrades, including the avoided costs of upgrades through electrification. Similarly, identifying areas where stranded costs could greatly impact affordability, can be helpful in prioritizing the pace of decarbonization.
- **Resilience:** Identify the time needed for gas utilities to reconnect businesses and homes to gas service in the event of an earthquake or other disaster. Identify risks to vulnerable populations when gas service is delayed/not restored for space heating, water heating and cooking.
- **Pathways:** Where possible, align pathway recommendations with WA State Energy Strategy findings and recommendations, including those that deal with the timing of decarbonization. Pathways should identify existing legal and regulatory authority/levers, legal and regulatory barriers as well as economic investments needed. Identify short term decarbonization “quick wins” that fall within existing UTC regulatory authority.

We ask the UTC to proceed with an examination that is transparent, informed by science, data, and community stories, and centers the recommended pathways for decarbonization on the health, climate impacts, safety, resiliency, and affordability for our most vulnerable residents.

We appreciate the opportunity to provide comments and would like to extend an offer to provide City of Seattle reports and data that may be helpful in informing the UTC’s work going forward.

Sincerely,

Michelle Caulfield
Interim Director, Office of Sustainability and Environment

⁴ [Heat related illness in Washington State; Washington State Department of Health](#)