

Comments by James Adcock on Docket UG-220242 Puget Sound Energy Natural Gas IRP
Docket number of this proceeding: UG-220242
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The title and date of the comment or comments:
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4/28/2023

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Puget proposes entering a new market: The generation, transportation, and sales of Synthetic Hydrogen Gas, and proposes to do so on the backs of existing Natural Gas ratepayers.

Here are a few of the regulatory issues involved:

RCW 80.28.030 -- Purity of Gas -- Hydrogen is dangerous, damages pipes, and customer equipment is not designed to safely burn Hydrogen Gas. Puget has already blown-up businesses in Seattle. In my neighborhood Puget builds a high voltage transmission line on top of a fossil fuel pipeline on top of a major regional earthquake fault line -- placing a transmission line tower right on top of a cliff formed by that earthquake fault line! And that pipeline has already failed once, killing children in our neighborhood. Please do not allow Puget to increase the risk of explosions by mixing Synthetic Hydrogen Fuel into their Natural Gas. Also, RCW 54.48.020 was not followed.

RCW 80.28.090 -- Unreasonable Prejudice or Disadvantage: Puget has already placed my neighborhood [Eastgate -- South Bellevue] in jeopardy by building such a transmission line on top of a fossil fuel pipeline on top of an earthquake fault line. Now Puget proposes to increase the risk in their Natural Gas lines by mixing Synthetic Hydrogen Fuel into that Natural Gas, and the increase possibility of explosion in end-customer equipment.

UTC needs to take seriously their responsibility to regulate utility safety. When during IRPs, I, as an engineer, ask Puget to take seriously the possibility of "The Big One" in their designs I just get laughed at.

RCW 80.28.040 -- Unjust Prices -- Puget proposes inflating Natural Gas Ratepayer rates in order to fund their monopoly expansion into a new business: Generation, Sale, and Pipeline Distribution of Synthetic Hydrogen Fuel. Even when other options, namely Hybrid Heat, accomplishes greater environmental goals at a much lower price -- a price which is actually negative! Yes, we can "have our cake and eat it too!" -- but not if Puget is allowed to falsely raise rates by engaging in insanely not-lowest-reasonable-cost methods -- in order to fund their proposed expansion into a new line of business, namely: the Generation, Sale, and Pipeline Distribution of Synthetic Hydrogen Fuel.

RCW 80.28.120 -- Regulation of Gas Companies: All Gas Companies subject to regulation by UTC. Generation, Sale, and Pipeline Distribution of Synthetic Hydrogen Fuel is such a Gas Company, whether such a Synthetic Hydrogen Company is a stand-alone entity, a partner with Puget, or Puget itself.

RCW 80.28.130 -- Security: Puget and/or its Synthetic Hydrogen Partners are not allowed to blow up customers, and UTC needs to regulate to make sure that safety is not decreased -- which certainly IS the case when Synthetic Hydrogen is mixed into Natural Gas.

RCW 80.28.190 -- Certificate required for the operation of a Synthetic Hydrogen Gas business, which would include safety and "is it in the public interest?" Synthetic Hydrogen gas is not safe and is not in the public interest -- since Hybrid Heat is such a more cost-effective solution to environmental needs.

Let's take a look overall at Puget's "Environmental" Plans: Turn Electricity into Synthetic Hydrogen to blend into their Natural Gas -- to turn back into electricity -- at a 30% round trip efficiency. Is this supposed to be some kind of "perpetual motion machine" or something? -- except that the round trip efficiency is only 30% -- meaning that 70% of the electricity is wasted. And if that electricity is "green electricity" then that means that Puget must build over 3X as many Wind Turbines to generate that electricity. Except Puget is choosing NOT to build Wind Turbines [aka "Renewables Overbuild Scenario"] -- so where is that green electricity -- that Puget is wasting 70% of -- by turning into Synthetic Hydrogen -- supposed to come from? Or is it that Puget doesn't actually propose to use "Green Hydrogen" but rather is proposing to use "Brown Hydrogen"?

The Gas IRP and the Electrical "Progress Report" are just a bad joke -- pretend "progress" while needlessly and excessively wasting ratepayer money. It's not that it can't be done and can't be done relatively inexpensively. It's just that Puget chooses not to do so. This is why we have a regulatory oversight agency. Please stop this Puget nonsense now.

Thank you,

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