

From: [Mr. Shelley Dahlgren, Phd \(shelley@dahlgren.com\)](mailto:shelley@dahlgren.com) Sent You a Personal Message
To: [Records Management \(UTC\)](#)
Subject: Docket No. U-210553 - Electrification is the only pathway to gas utility decarbonization
Date: Thursday, July 27, 2023 3:35:32 PM

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Dear Amanda Maxwell - Executive Director - Washington Utilities and Transportation Commission,

Dear Executive Director Maxwell,

Thank you for the opportunity to provide written comment on the Commission's gas decarbonization examination Dashboard. As a Washington resident concerned with the impacts of the climate crisis, I have grave concerns with how the results may be misinterpreted to support false climate solutions, based on the materials that have been released so far. I'd like to offer the following recommendations to the Commission:

1. Clearly explain the risks and costs of using alternative fuels like hydrogen and biomethane in buildings. Many of these risks, such as the health, indoor air quality, and safety hazards of continued reliance on combustion fuels, are likely not captured by the Dashboard's modeling analysis. Decarbonization strategies based on alternative fuels depend on several noncommercial technologies whose future availability and prices are highly uncertain, and which are not a viable alternative to electrifying our buildings.
2. Provide greater transparency and explanation of modeling inputs and assumptions, and address any potential errors. The Dashboard's apparent finding that the alternative fuels pathway is lower-cost than an electrification pathway is contradicted by the State Energy Strategy, the 2023 Biennial Energy Report, and other expert analyses -- and there's currently no way to understand how these different conclusions were reached.
3. Clearly explain that in every pathway examined in the Dashboard, including the "alternative fuels" pathway, electrification appears to be the primary decarbonization strategy for buildings. This means that policies and investments supporting rapid building electrification are "no-regrets" options.

Thank you for considering these comments.

Sincerely,

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