

From: [Court Olson](#)
To: [Cebulko, Bradley \(UTC\)](#); [UTC DL Records Center](#)
Subject: CETA rules making comments I made today
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Hello Mr. Cebulko & Commissioners.

Thank you for the opportunity to speak in your hearing this morning. To enable you to better digest the verbal comments that I gave today, please find those same comments written out below.

1. Thank you Commissioners and UTC staff for this opportunity to comment.
2. My name is Court Olson. I live in Bellevue WA. For context, my background: I have three Engineering & Construction Mgmt. degrees, I'm a Project Manager & Green Bldg. Consultant to commercial building owners, also a PSE IRP mtgs participant. I have extensive energy efficiency expertise.
3. I have general concern about the potential for investor-owned utilities to game the law & rules.
4. In general, there needs to be less profit motivation for adding generation and transmission capabilities and more financial incentive provided for utilities to reduce peak load demand.
5. Concern about load forecasting and the inflation of demand growth when the trend in new buildings is mandated by the State energy code tightening to be shrinking, and when there is a growing trend to improve efficiency of existing building stock and popular movement toward the development of distributed energy.
6. PSE has repeatedly shown the tendency to overstate future power demands, and pursue generation and transmission infrastructure building when it hasn't proven to be necessary.
7. There has been use of historical weather data that doesn't take into account the ongoing warming trend that will continue into the future. Rules should address this in demand forecasting.
8. Concern that PSE in particular is not adequately and rapidly ramping up Demand Response capabilities that would keep peak demand growth in check and avoid the necessity for building more infrastructure.
9. Concern about IRP process changing from every 2 years to every 4 years.
10. Concern about the missing definition of "GHG neutral" in 2030 rule. Needs to be carefully defined.
11. Concern about definition of "Cost Effective" and "least cost" comparison. Traditional Engineering Economy formula for time value of money needs to have a very low or even negative discount rate when it comes to GHG emissions benefits in the comparison of options.
12. Any "Lowest reasonable cost" calculations must include the social cost of carbon. As I read it, this is in the rules now, but the social cost of GHG emissions is not clearly stated in the definition of "Lowest reasonable cost."
13. Another concern. How is actual Utility response to public comment handled? Are questions actually answered or are they circumvented without directly addressing the questions? I've seen this often happening. The value of public comment is then eroded.

Court

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