

Comment

Devon Kellogg

Owner

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Comment Information

CONTACT INFORMATION

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State/Province WA

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Details

Comments Greeting UTC Members,

This comment is in reference to Docket # UE-210183 draft rules addressing the "use of electricity" requirement in RCW 19.405.040(1)(a).

I am concerned about a pattern I see with PSE incentivizing use of natural gas over electricity for water and home heating. In a rebate program PSE was offering back in summer 2021, they were promoting moving from electric heating to heat pumps with gas backup, while no rebates were offered to move from gas furnace to (electric) heat pumps. More recently in fall 2021, PSE was offering incentives for moving from electric water heaters to tankless gas water heaters.

If PSE electric customers are being enticed to move from electric to gas for home and water heating appliances, this goes against both PSE's advertised company goals and the greenhouse gas emission reduction goals of CETA.

This is concerning first of all because it is false advertising. PSE claims on their website: "We're committed to reducing emissions from PSE electric and gas operations" and "We aspire to reach net

zero carbon emissions for natural gas used in customer homes and businesses by 2045, with an interim target of a 30% emissions reduction by 2030." The promotions offered reflect a different internal goal.

More importantly, incentivizing gas over electric heating undermines the intent of CETA, which requires PSE to generate electricity from renewables by 2045.

After looking over the use of electricity draft rules, it appears that PSE may be justifying this push to move electric customers to gas in part by investing in "renewable natural gas". Is this an attempt at "clever accounting" - reducing the future CETA-compliant electric load by moving some of this load to gas, and then claiming increased "renewable natural gas" use as a net offset from any remaining non-renewable electric load?

Either way, I would like to remind the UTC members that according to the US EPA, "natural gas" has a 90% or greater methane content after processing (typically 96-98%). The latest IPCC August 2021 report clearly identifies "super pollutant" methane abatement as a critical means of limiting future warming. As such, any attempts to "offset" current electric grid users to gas usage in any form would undermine the goals of CETA. Please do not allow it!

In closing, I urge you to define clear parameters for PSE for both truthful and consistent advertising of intent and for meeting the strongest greenhouse gas reduction goals of CETA (without transferring existing electric users to gas).

Sincerely,
Devon Kellogg (teacher and mother of 2)

P.S. I have included a portion of my correspondences with PSE back in April - May of 2021 to further illustrate the point:

Submitted comment to PSE via electronic form on April 20, 2021 in regards to advertised rebates on heat pumps:

"Do you have any discounts or rebates for Gas Forced-Air Furnace to Electric Heat Pump conversion in a single-family home?"

Energy Advisor -- mail --
Wed, Apr 21, 8:05 AM
to me

Hello,

Thank you for contacting PSE's Energy Advisor team. In order for you to qualify for a heat pump rebate, you must be switching from some form of electric resistance heating, such as baseboard heaters or an electric forced air furnace.

For more information on PSE rebates and offers, as well as qualifications, please visit www.pse.com/rebates

Some of our rebates have increased incentive amounts for income-qualified customers. You can find out more information here: <https://www.pse.com/rebates/efficiency-boost>

Should you need additional assistance, please contact a PSE Energy Advisor at 1-800-562-1482, Monday through Friday, 8 a.m. to 5 p.m.

For valuable energy savings tips, rebates and links to tools that will help manage & monitor the home's energy usage please visit: pse.com/lower

Thank you,
Emily (she/her)
Energy Advisor
PUGET SOUND ENERGY

tel. 1-800-562-1482

Devon Kellogg
Apr 21, 2021, 9:03 AM
to Energy

Hi Emily,

Thank you for the reply. I'm wondering why are you not offering incentives for customers who are on Nat Gas who want to switch to electric or heat pump for heating and appliances? Isn't PSE under mandate to be 100% renewable? Or is this only for electricity?

Will you be offering incentives for transitioning off Nat Gas in the future?

Thank you,
Devon Kellogg and family

Energy Advisor -- mail --
Apr 27, 2021, 7:38 AM
to me

Hello,

The clean energy transformation act is specifically related to electric supply. The reason we are not able to offer the heat pump rebate converting from natural gas is related to the electric rebate budget, where there would be no electric savings achieved from this conversion. To learn more about our clean energy implementation plan, please visit <https://cleanenergyplan.pse.com/>.

For valuable energy savings tips, rebates and links to tools that will help manage & monitor the home's energy usage please visit: pse.com/lower

Thank you,
Emily (she/her)
Energy Advisor
PUGET SOUND ENERGY
tel. 1-800-562-1482

Devon Kellogg
May 8, 2021, 5:09 PM
to Energy

Hi Emily,

Can you please clarify a confusing point?

You say you do not offer rebates for those wanting to move from gas to electric because "The clean energy transformation act is specifically related to electric supply." Yet the link you provided (<https://www.pse.com/pages/together>) states as it's top goals: " We're committed to reducing emissions from PSE electric and gas operations" and "We aspire to reach net zero carbon emissions for natural gas used in customer homes and businesses by 2045, with an interim target of a 30% emissions reduction by 2030." These statements both involve reducing emissions from gas as well as electric supply.

As electricity can more easily be switched to 100% renewables than gas (since as you know gas is both composed of GHGs and releases GHGs as a byproduct of use), it seems disingenuous for you to not offer rebates for those wanting to switch from gas to electric in their homes, does it not? Can you please clarify your reasoning here?

Thank you,
Devon

Energy Advisor -- mail --

May 10, 2021, 7:42 AM
to me

Hi Devon,

My apologies. The Clean Energy Transformation Act is specifically related to electric supply. This is an objective set in Washington State that PSE intends to meet regarding our electric supply. In addition to that, we do have the goal to reduce our gas emissions. We are still early in this transition, and have not made the decision to incentivize a natural gas to electric transition.

For valuable energy savings tips, rebates and links to tools that will help manage & monitor the home's energy usage please visit: pse.com/lower

Thank you,
Emily (she/her)
Energy Advisor
PUGET SOUND ENERGY
tel. 1-800-562-1482

Source	Web	Open Date	
Filing Support	No	Web Create Date	11/12/2021
Exclude From Comment Summary	No	Closed Date	

Related Case Information

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Owner	 Notes Contacts	Staff Case Lead	

Themes

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