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**From:** [Michael Laurie](#)  
**To:** [Public Involvement \(UTC\)](#)  
**Subject:** Public comment on November 7 UTC Hearing on 2019 IRP petition (UE-190485)  
**Date:** Tuesday, November 5, 2019 11:55:10 AM

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The UTC should pause all investor owned utility major infrastructure projects until the next (2021) IRP document has been delivered and acknowledged – utilities should not move forward with new infrastructure projects which are unguided by the IRP process and while the new CETA legislation is not yet in place.

Continue the TAG process – Utilities should publish and seek TAG technical inputs and Public Participation inputs on the 2019 IRP.

Today, 97% of the 2019 IRP timeline, from process start to release of the draft IRP, is behind us. There is no reason that PSE should not release the 2019 IRP, which should be substantially complete at this time.

There are multiple 2019 IRP action items which PSE has said will be resolved in the 2019 IRP document. The 2019 IRP document, answering these action items, must be delivered. The TAG formally requests these 2019 IRP data items be published by PSE:

- 2019 IRP sensitivity analysis which includes no new Fossil Fuels Average cost of wind, solar, battery storage and pumped hydro bids (not individual bids) TAG research has resulted in acquiring bid data which is significantly lower than renewable energy sources which are just a few years old. The TAG has provided this data to PSE. It is important to understand, particularly with CETA rulemaking underway, if the bid data that PSE is using for these same capabilities in their 2019 IRP analyses are consistent with TAG research.
- PSE has claimed that renewable energy costs will increase. What references does PSE have to justify an increase in solar energy costs?
- PSE scheduled coal generation contract expiration dates and the KWH capacity of each contract Energize Eastside questions answered Full accounting of assumptions and modeling used to calculate upstream methane emissions Full disclosure of inputs used in Aurora, Plexos or any other models used to determine their preferred resource portfolio Full accounting of assumptions that went into forecast of a 20 percent increase in gas use for the gas utility used for peak loads over the 20-year IRP timeframe. Additional disclosure of expectation of gas use for average gas use for the same period.
- Disclosure of last 10 years of summer and winter demand peaks

I am concerned that if the 2019 IRP is not completed and if these questions are not addressed that in the next IRP process we will have to start all over again on these issues.

Thanks for your consideration of these issues.

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