

A Washington State Chapter of the National Audubon Society P.O. Box 2524, Olympia, WA 98507

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Black Hills Audubon Society is a volunteer, non-profit organization of more than 1,300 members in Thurston, Mason, and Lewis Counties whose goals are to promote environmental education and protect our ecosystems for future generations.

September 20, 2019

Commissioners Danner, Balasbas, and Rendahl, Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

Dear Commissioners Danner, Balasbas, and Rendahl,

The Black Hills Audubon Society, a chapter of the National Audubon Society, has about 1300 members in the counties of Thurston, Mason, and Lewis in Washington State. A major part of our mission is to preserve and protect ecosystems for future generations.

We are writing to you relating to PSE's stake in one of the largest coal-fired electricity generation plants in the west, Colstrip Units 3 and 4. We are concerned that, despite the fact that coal will be phased out of our grid by 2025 in compliance with the new 100% clean energy legislation (SB 5116) enacted in the 2019 legislative session, PSE is continuing to invest in plants that significantly enhance climate change.

The Washington Legislature thought they had moved the largest contributor to climate-polluting greenhouse gases in the American West – the Colstrip coal plant – toward retirement in 2025 with the passage of SB 5116, the Clean Energy Transformation Act (CETA). But Colstrip is positioned to run past 2025. While the new law CETA requires no more coal by 2025, Puget Sound Energy (Washington) has not yet updated their 2019 Integrated Resource Plan.

We are concerned that PSE is pouring millions of dollars into the plant and propping up its existence beyond the legal cutoff of 2025 mandated by this new law. PSE customers should not be bearing the cost of investments that they will not use. As an analogy, a homeowner wouldn't invest in a new roof if they knew the house was going to be torn down within five years.

Continued investment in Colstrip may undermine the legislative intent of the 100% clean electricity law, which called for an end of coal power no later than 2025. We appreciate your attention to this comment.

Sincerely,

Sam Merrill, Chair **Conservation Committee** Black Hills Audubon

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Cc:

Steve Johnson, Senior Policy Advisor, UTC Brad Cebulko, Energy Policy Advisor, UTC Kathi Scanlon, Regulatory Analyst, UTC Lisa Gafken, Washington Assistant District Attorney