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Puget Sound Energy
355 110th Ave NE
Bellevue, WA 98004

RE: Puget Sound Energy All-Source Request for Proposals Comment – Docket #UE-210220

The Oregon State and Washington State Building and Construction Trades Councils are jointly submitting these comments addressing why Puget Sound Energy (PSE) should ensure that long duration, pumped storage hydro projects in the region are given an adequate evaluation in the upcoming RFP. Specifically, two projects in the region stand out: Swan Lake and Goldendale Energy Storage projects. The RFP should properly value the direct economic and workforce impacts of the proposed \$3+ billion of investment in rural communities.

We do not believe the PSE IRP adequately analyzes the value of the Swan Lake and Goldendale Energy Storage projects. Therefore, the Washington Utility and Transportation Commission should first require PSE to remedy the shortcomings of PSE IRP analysis, thereby ensuring any resources acquired through the RFP process reflects the most suitable resources in accordance with the Commission's requirements and future energy mandates of our region. After the corrections are made PSE should then reissue the RFP.

The Oregon and Washington Building and Construction Trades Councils are concerned that due to PSE's low valuation of pumped storage in its recent IRP, the RFP will negatively impact important projects like Swan Lake, Goldendale, and future potential long duration storage development in the region. The Building Trades also feels that these two projects – Swan Lake and Goldendale, are some of the most cost-effective investments for Washington to achieve its 100% clean energy goal and that this is not adequately reflected in the PSE's IRP.

Furthermore, given the recent headline grabbing Texas and California blackouts, there is a concern that PSE will not be able to affordably and effectively keep lights on in their service territory looking out to 2027. An E3 study from 2019 projects an increasing capacity shortfall in the Pacific Northwest of approximately 10 gigawatts. PSE needs significant investments in cost-effective storage technologies. Investing in mature, proven technologies that can provide the necessary large-scale back-up power our state and region require is paramount.

We firmly believe that the environmental and economic impacts of prioritizing long duration, clean energy storage projects within the RFP process could dually support PSE and Labor's goals. Led by the Oregon Building and Construction Trades Council, and the Washington Building Trades, Labor is gearing up for an anticipated 6,000 union jobs in the next 10 years across both Washington and Oregon. These jobs will be created at two significant project sites alone: Swan Lake Energy Storage Project in Klamath Falls, Oregon and the Goldendale Energy Storage Project in Goldendale, Washington. Additionally, these two projects could provide the needed clean energy capacity to store large amounts of solar and wind generated power supply – ultimately advancing Washington toward its Clean Energy Transformation Act (CETA) mandate.

CETA makes it necessary to build new infrastructure – whether it is generation, transmission or as in this case, storage. Labor has a unique perspective on energy projects not only from an actual physical construction and engineering perspective but also from a public policy perspective. Long before our members from the 25 different crafts break ground, and start to physically build a project, we are involved in the public policy and regulatory aspects that made the project desirable and possible.

PSE's Evaluation Criteria and Scoring in the RFP (Exhibit A) lays out a Qualitative Scoring Rubric. Thirty-five percent of this rubric is associated with CETA Equity Plan. We commend PSE for recognizing the importance of the Customer Benefit Indicators (CBI) and placing emphasis on diversity, equity, and inclusion in the process. The Oregon and Washington Building and Construction Trades Councils are committed to promoting access to construction careers for females, BIPOC individuals, and others with social and economic disadvantages.

Regarding the CBI metrics, we hope that PSE will cast equal emphasis on all five indicators. Labor is proud to have MOUs in place with Copenhagen Infrastructure Partners (project owners of both Swan Lake and Goldendale Energy Storage projects) on both the Swan Lake and Goldendale projects. The trades recognize the unique economic, environmental, and community-development opportunity that long duration energy storage projects play in our region. Additionally, against the backdrop of a looming capacity shortfall in the region, strained international supply chains for raw materials like lithium, and the need to support rural communities from both a health and economic perspective, projects like Swan Lake and Goldendale will be the cornerstone of our renewable energy future. These projects alone will employ over 6,000 skilled construction workers over the next ten years, invest over \$3 billion into rural communities, and directly address the clean energy goals of the Pacific Northwest.

The Washington State Building and Construction Trades Council takes great pride in being active stakeholders in Washington state's vision for a clean energy future. We are on the front lines of environmental and clean energy policy. We have played an instrumental role in both supporting passage of environmental regulations in the legislature and implementing them on the job site.

In conclusion, we believe the Washington Utility and Transportation Commission should direct PSE to remedy the deficiencies of PSE IRP analysis, thereby ensuring that the value of the Swan Lake and Goldendale Energy Storage projects can be properly evaluated in the PSE RFP process.

Sincerely,



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