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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

UG-210729

Comments by James Adcock on Docket UG-210729 Perpetual Net Present Value Methodology
Docket number of this proceeding: UG-210729
Commenting party's name: James Adcock, Electrical Engineer
The title and date of the comment or comments:
Comments Related To Utilities Providing Discounts to Consumers Installing Natural Gas Lines, Docket UG-210729

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Comments by James Adcock, Electrical Engineer, MIT, decades-long participant in public Integrated Resource Planning Processes. James has spent his entire career engaging in statistical analysis, including at three Fortune 500 companies.

It does not make a whole lot of sense to force Washington State ratepayers to pay for the conversion of end consumers of Electricity TO Natural Gas, while at the same time forcing Washington State ratepayers to pay for the conversion of Utility Electrical Generation FROM Natural Gas to Renewables.

Of course, it also doesn't make a whole lot of sense to force Washington State ratepayers to pay for the generation of renewable energy that Washington State Utilities then sell at discounted rates down to California rather than actually allowing the USE of that electricity by Washington State ratepayers. And then saying that such selling of renewable energy down to California then generates for Washington State Utilities a "Golden Ticket" allowing them to continue to burn Natural Gas in their generators even after 2045 when CETA law clearly says that they cannot do so -- that after 2045 ONLY renewables and non-emitting can be used -- which is the plain meaning of ONE HUNDRED PERCENT!

What does make a whole lot of sense is converting Washington State ratepayers who are continuing to heat their homes and businesses with old-fashioned resistance heating -- such as electric baseboards -- what makes a whole lot of sense is converting those Washington State ratepayers to heat pump heating, which on a seasonal average creates 13X --1300% -- more heating per kilowatt used than old-fashioned resistance heating -- when it is cost effective for ratepayers to subsidize that conversion -- saving 92% of the electricity in the process -- rather than having to pay utilities to build EVEN MORE renewable power generation -- which they then just sell again at discounted rates down to Californian consumers -- forcing our Washington State ratepayers to subsidize Californian consumers, so that utilities can generate a "Golden Ticket" allowing them to continue to pollute contrary to the clear CETA language which says ONE HUNDRED PERCENT!

Maybe what Commissioners should do, rather than forcing ratepayers to:

- 1) Pay for the Conversion of Consumers From Electricity TO Natural Gas, AND
- 2) Pay for the Conversion of Utilities FROM Natural Gas to Renewables, AND
- 3) Pay for that Renewable Electricity to be sold at discounted prices to Californian consumers, AND

4) Then Giving Utilities a “Golden Ticket” [aka “Retained REC”] allowing Washington State Utilities to continue to pollute contrary to clear ONE HUNDRED PERCENT language in CETA.

-- Maybe what Commissioners should do instead, is simply require ratepayers to cost-effectively help convert users with old-fashioned resistance heating to the new 13X – 1300% -- more efficient heat pumps that actually USE Washington State Electricity – which CETA clearly states has to become ONE HUNDRED PERCENT clean – so that the renewable energy that Washington State Ratepayers are being forced to pay for is actually USED in Washington State – rather than being sold at a discount down to California – and then UTC giving Washington State Utilities a magical “Golden Ticket” allowing them to continue to pollute in Washington State contrary to the clear language in CETA which says:

ONE HUNDRED PERCENT!

Sincerely,

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