From: Sierra Club <information@sierraclub.org> on behalf of Neal Umphred

<nealumphred@hotmail.com>

Sent: Sunday, August 11, 2013 5:47 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

Neal Umphred 9301 Avondale Rd NE Apt J2054 Redmond, WA 98052-3354

Sierra Club <information@sierraclub.org> on behalf of Jenny Becker <meerkat42

@comcast.net>

Sent:

From:

Sunday, August 11, 2013 5:47 AM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

35

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

Jenny Becker 17404 119th Ln SE Apt H10 Renton, WA 98058-6255 (206) 940-6676

Sierra Club <information@sierraclub.org> on behalf of Pamela Clark

<pamelyns@yahoo.com>

Sent:

From:

Sunday, August 11, 2013 5:47 AM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

Pamela Clark 1521 N Argonne Rd # C238 Spokane Valley, WA 99212-2545 (505) 281-2195

From:

Sierra Club <information@sierraclub.org> on behalf of Tom Shea

<tomshea@centurytel.net>

Sent:

Sunday, August 11, 2013 5:47 AM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

2013 AUG 12 AM 8:

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard

to obtain, and will require additional costs. PSE has refused to

fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

Tom Shea PO Box 200 Snoqualmie, WA 98065-0200 (425) 831-0033

From: Sierra Club <information@sierraclub.org> on behalf of Susan Alford

<s_alford@msn.com>

Sent: Sunday, August 11, 2013 5:47 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

Susan Alford 4147 45th Ave SW Seattle, WA 98116-4118

From:

Sierra Club <information@sierraclub.org> on behalf of Willie Mccoy

<spankyho@hotmail.com>

Sent:

Sunday, August 11, 2013 5:47 AM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

Willie Mccoy 702 2nd Ave W Apt 3 Seattle, WA 98119-3763

From: Sierra Club <information@sierraclub.org> on behalf of John Baker

<cody@codybaker.org>

Sent: Sunday, August 11, 2013 5:47 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

Aug 11, 2013

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

John Baker 6207 25th Ave NE Seattle, WA 98115-7105 (330) 987-7155

From: Sierra Club <information@sierraclub.org> on behalf of David Miner <dminer8055

@comcast.net>

Sent: Sunday, August 11, 2013 5:47 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and in expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

David Miner 8055 Kispiox Rd Blaine, WA 98230-9557 (360) 778-2803

From: Sierra Club <information@sierraclub.org> on behalf of Lynn Offutt

<lynnoffutt@hotmail.com>

Sent: Monday, August 12, 2013 3:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Lynn Offutt 2513 113th PI SE Everett, WA 98208-7427 (425) 225-5222

From: Sierra Club <information@sierraclub.org> on behalf of Maria Magana

<mariamagana@gmail.com>

Sent: Monday, August 12, 2013 3:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Maria Magana 1290 Hillcrest Dr Burlington, WA 98233-1469 (360) 333-7015

From: Sierra Club <information@sierraclub.org> on behalf of Lia Craven

craven@hotmail.com>

Sent: Monday, August 12, 2013 3:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Lia Craven 224 N G St Tacoma, WA 98403-2206 (253) 359-1476

From:

Sierra Club <information@sierraclub.org> on behalf of Claire Grover <cgrover11

@gmail.com>

Sent:

Monday, August 12, 2013 3:08 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Claire Grover 2400 4th Ave Seattle, WA 98121-3404

From:

Sierra Club <information@sierraclub.org> on behalf of Albert Bechtel
bigjbechtel4711

@msn.com>

Sent:

Sunday, August 11, 2013 5:47 AM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and ingreasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

Albert Bechtel 4131 11th Ave NE Apt 109 Seattle, WA 98105-6319 (206) 834-0204

From:

Sierra Club <information@sierraclub.org> on behalf of Roy Munroe <roymunroe9041

@comcast.net>

Sent:

Monday, August 12, 2013 3:09 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

tam very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

I'm really wondering just whose side of this issue you are on and why although from the outset of this outdated and dirty energy productrion method it becomes quite clear that the Health, Welfare and doing what's right is not on your agenda nor will it be soon. How in the hell can you justify killing our ecosystems with dirty coal? Profits? CEO salaries and Bonuses? If you had the guts to put your money into the future instead the Dinosaurs of the past you would be a front leader in future production and consumption of healthy, clean and renewable energy but you have once again chosen to stay with the outdated methods for supplying energy. You do realize that you might get away from it for awhile But.....there will be an end to your production methods with or without you involved. You will continue to harm our only planet, it's people and all of the diversified life forms that share this planet. Once again my personal respect for your choices of profits over the well being of the planet has taken yet another negative dive and hopefully I can find a way to say good bye to you and spend my money elsewhere with real change for out energy solutions!

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

Roy Munroe 127 Decatur St NW Olympia, WA 98502-5220 (360) 534-9263

From:

Sierra Club <information@sierraclub.org> on behalf of Johnny Jones

<johngwjones@gmail.com>

Sent:

Monday, August 12, 2013 3:08 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Johnny Jones 2312 N 77th St Seattle, WA 98103-4929

From: Sierra Club <information@sierraclub.org> on behalf of Brian Venable

<brainscience2003@yahoo.com>

Sent: Monday, August 12, 2013 3:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Brian Venable 14300 Greenwood Ave N Apt 214 Seattle, WA 98133-6869 (425) 408-2532

From:

Sierra Club <information@sierraclub.org > on behalf of Alisa Reebs <areebs09

@gmail.com>

Sent:

Monday, August 12, 2013 3:08 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Alisa Reebs 3014 W Lake Sammamish Pkwy NE Redmond, WA 98052-5900

From: Sierra Club <information@sierraclub.org> on behalf of James Mckeon

<thefooljames@gmail.com>

Sent: Monday, August 12, 2013 3:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

James Mckeon 59 Rosehip Rd Eastsound, WA 98245-8966

From: Sierra Club <information@sierraclub.org > on behalf of Charles Dooley <chdooley01

@hotmail.com>

Sent: Monday, August 12, 2013 3:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Charles Dooley 514 Willow Rd Bellingham, WA 98225-7841 (360) 527-1214

From: Sierra Club <information@sierraclub.org> on behalf of Tamara Turner <oct102002

@msn.com>

Sent: Monday, August 12, 2013 3:09 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am furious that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another

20 years! As a PSE customer, I am disgusted that my payment for natural gas funds a company that is so backward and short-sighted.

AND I WILL OPPOSE ANY FUTURE PSE REQUESTS FOR RATE INCREASES until PSE moves to a ecologically sound energy source.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I demand that the commission critically and responsibly evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

Tamara Turner 1931 E Calhoun St Seattle, WA 98112-2644 (206) 325-9481

From: Sierra Club <information@sierraclub.org> on behalf of Cathy Seay

<seaymouse@yahoo.com>

Sent: Monday, August 12, 2013 3:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Cathy Seay 402 Park Pl Everett, WA 98203-2023 (425) 252-0281

From: Sierra Club <information@sierraclub.org> on behalf of Marc Benedict

<benedict@thurston.com>

Sent: Monday, August 12, 2013 3:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Marc Benedict 19223 Denmark St SW Rochester, WA 98579-8610

From:

Sierra Club <information@sierraclub.org> on behalf of Glenn Gillis <glenngillis7

@gmail.com>

Sent:

Monday, August 12, 2013 3:38 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

IUG 12

2

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

25.

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Glenn Gillis 20424 98th PI S Kent, WA 98031-4308

From: Sierra Club <information@sierraclub.org> on behalf of Linda Kroeger

<cyrusnw@comcast.net>

Sent: Monday, August 12, 2013 3:38 PM

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-12076)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Linda Kroeger 9223 Cyrus Ave NW Seattle, WA 98117-2646 (206) 782-6983

From: Sierra Club <information@sierraclub.org> on behalf of Jay Russo <stellarjay1

@gmail.com>

Sent: Monday, August 12, 2013 3:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

3 | Z

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Jay Russo 1262 Duncan Creek Rd Stevenson, WA 98648-6177 (509) 427-5002

From: Sierra Club <information@sierraclub.org> on behalf of Michael Winger

<mgwwgw@msn.com>

Sent: Monday, August 12, 2013 3:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767).

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two statebased legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Michael Winger 2507 41st St SE Puyallup, WA 98374-1730 (253) 845-1286

From: Sierra Club <information@sierraclub.org> on behalf of Pat Oneill <pationeill2012

@gmail.com>

Sent: Monday, August 12, 2013 3:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

OBAUGIZ PA 3

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Pat Oneill 7501 Johnson Rd Colton, WA 99113-8748 (509) 592-5672

From: Sierra Club <information@sierraclub.org> on behalf of Andrew Brinkhaus

<igotvertigo@hotmail.com>

Sent: Monday, August 12, 2013 3:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120 (25))

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

្ឋា

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Andrew Brinkhaus 14600 NE 32nd St Apt I9 Bellevue, WA 98007-3691 (425) 401-9725

From: Sierra Club <information@sierraclub.org > on behalf of Jennifer Schaible <aaka117

@hotmail.com>

Monday, August 12, 2013 4:09 PM Sent:

UIC DL Records Center

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767) To:

Subject:

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two statebased legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Jennifer Schaible 2512 30th Street Ct SE Puyallup, WA 98374-1622 (253) 446-9673

From: Sierra Club <information@sierraclub.org > on behalf of A Frank

<crabcakegranny@msn.com>

Sent: Monday, August 12, 2013 4:09 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

7) 4013 AUG 12 PH 4: 13

A Frank 4126 145th PI SE Snohomish, WA 98296-6904

From: Sierra Club <information@sierraclub.org> on behalf of Marles Blackbird

<mablackbird@gmail.com>

Sent: Monday, August 12, 2013 4:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Marles Blackbird 1125 12th Ave SE Apt B301 Olympia, WA 98501-7339 (360) 357-7152

From: Sierra Club <information@sierraclub.org> on behalf of Keith Neubauer

<ckneubmusic@q.com>

Sent: Monday, August 12, 2013 4:08 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

We only get one chance to get this idea right! Each year the globe gets warmer!

Sincerely,

Keith Neubauer 8205 SE Middle Way Vancouver, WA 98664-2311 (360) 694-1835

Sierra Club <information@sierraclub.org> on behalf of Benjamin Greuel From:

<bgreuel@gmail.com>

Sent: Monday, August 12, 2013 4:08 PM

To:

UTC DL Records Center

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767) Subject:

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two statebased legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Benjamin Greuel 2601 NW 65th St Apt 3 Seattle, WA 98117-5900 (360) 670-2938

Sierra Club <information@sierraclub.org> on behalf of Patricia Daly <pjdaly_4 From:

@hotmail.com>

Sent: Monday, August 12, 2013 4:08 PM

To:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767) Subject:

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted in a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two statebased legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional cost.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plan and have them incorporate the true cost of coal.

Sincerely,

Patricia Daly 707 18th Ave E Seattle, WA 98112-3927

From: Sierra Club <information@sierraclub.org> on behalf of Danica Hendrickson

<danicahendrickson@gmail.com>

Sent: Monday, August 12, 2013 4:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Danica Hendrickson 6522 Phinney Ave N Apt 304 Seattle, WA 98103-5246

From:

Sierra Club <information@sierraclub.org> on behalf of Frances Burleson <annie13764

@gmail.com>

Sent:

Monday, August 12, 2013 4:39 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-12076)

AUG 12

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Frances Burleson 31 Lower Hadlock Rd Apt 14 Port Hadlock, WA 98339-9787 (360) 302-5040

From:

Sierra Club <information@sierraclub.org> on behalf of Ruth Weedman

<ruthleew@gmail.com>

Sent:

Monday, August 12, 2013 4:39 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120Z67)

13 AUG 12

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Ruth Weedman 103 Janice Ave Longview, WA 98632-9409

From: Sierra Club <information@sierraclub.org> on behalf of Jennifer Molfetta <jmolf900

@yahoo.com>

Sent: Monday, August 12, 2013 4:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Thank you!

Sincerely,

Jennifer Molfetta 4223 Alabaster Ln SE Lacey, WA 98503-2191

From:

Sierra Club <information@sierraclub.org> on behalf of David Sparling

<dsparling@igc.org>

Sent:

Monday, August 12, 2013 4:38 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

္

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

David Sparling PO Box 88637 Steilacoom, WA 98388-0637 (253) 588-9611

From: Sierra Club <information@sierraclub.org> on behalf of Thomas Moehlman

<tjmoehlman@comcast.net>

Sent: Monday, August 12, 2013 4:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120762)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Thomas Moehlman 32322 44th PI SW Federal Way, WA 98023-2408

From:

Sierra Club <information@sierraclub.org > on behalf of Alycia Staats

<alycia.staats@gmail.com>

Sent:

Monday, August 12, 2013 4:38 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-12076

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Alycia Staats 7344 39th Ave NE Seattle, WA 98115-6004

From: Sierra Club <information@sierraclub.org> on behalf of Karen Byrd

<km_byrd@msn.com>

Sent: Monday, August 12, 2013 4:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120763)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Karen Byrd 5631 151st St SE Everett, WA 98208-8906

From: Sierra Club <information@sierraclub.org> on behalf of Gretchen d'Armand

<gdarmand@whidbey.com>

Sent: Monday, August 12, 2013 4:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Gretchen d'Armand 3764 Talking Cir Langley, WA 98260-8637 (360) 221-2162

From: Sierra Club <information@sierraclub.org> on behalf of Joel Johnson <giv757

@live.com>

Sent: Monday, August 12, 2013 4:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Joel Johnson 2900 General Anderson Rd Apt 71 Vancouver, WA 98661-9021 (360) 693-9020

From: Sierra Club <information@sierraclub.org> on behalf of Judy Thompson

<jayteehu@comcast.net>

Sent: Monday, August 12, 2013 4:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Judy Thompson 215 NW 41st St Seattle, WA 98107-4930 (206) 784-1267

From: Sierra Club <information@sierraclub.org> on behalf of David L. Edwards, M.D.

<mjdocdle@comcast.net>

Sent: Monday, August 12, 2013 4:38 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

David L. Edwards, M.D. 1607 East Bay Dr NE Olympia, WA 98506-3214

From:

Sierra Club <information@sierraclub.org> on behalf of Mary Paananen

<mspaananen@earthlink.net>

Sent:

Monday, August 12, 2013 4:39 PM

To:

UTC DL Records Center

Subject:

RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Mary Paananen 7024 33rd Ave NE Seattle, WA 98115-5909

From: Sierra Club <information@sierraclub.org> on behalf of Beth Dannhardt

<bdannhardt@triumphtx.org>

Sent: Monday, August 12, 2013 4:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Beth Dannhardt 851 Cutler Way Zillah, WA 98953-9127 (509) 865-6860

From: Sierra Club <information@sierraclub.org> on behalf of Eric Dolph

<dolpheric@yahoo.com>

Sent: Monday, August 12, 2013 4:39 PM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 12, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Eric Dolph 2707 Brackett Ave Yakima, WA 98902-4057 (509) 452-2396

From: Sierra Club <information@sierraclub.org> on behalf of Daniel Moore

<dintystew@gmail.com>

Sent: Sunday, August 11, 2013 8:47 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

Daniel Moore 2715 19th Ave S Seattle, WA 98144-5151

From: Sierra Club <information@sierraclub.org> on behalf of Jovon Crain <jwcs22

@gmail.com>

Sent: Sunday, August 11, 2013 8:47 AM

To: UTC DL Records Center

Subject: RE: Comments on Puget Sound Energy Integrated Resource Plan (UE-120767)

Aug 11, 2013

Utilities and Transportation Commission (UTC) WA

Dear (UTC),

I am very disappointed that Puget Sound Energy is planning to continue financing its dirty, dangerous, and increasingly expensive coal plant for another 20 years.

There are cleaner, safer, and less risky alternatives. PSE's plant may require hundreds of millions of dollars to clean up its dirty air, water, and mining waste, and now is the time for PSE to be honest about the true cost of keeping a dying coal plant on life support.

PSE has not accounted for the true cost of burning coal; from carbon pollution to leaky coal ash ponds, PSE has left off coal's big liabilities from the cost-benefit equation. Here are some of the main concerns with PSE's 2013 Integrated Resource Plan (UE-120767):

No price or regulation on carbon for the next 20 years. Although there is currently no carbon cap or tax in Washington, federal or state action is anticipated in the near future, and is almost certain to occur with the next two decades. As President Obama noted a recent speech about climate disruption and carbon pollution: "We limit toxic chemicals in our air and water, but power plants can dump unlimited amounts of carbon pollution into the air for free. That's not right, that's not safe, and it needs to stop."

No inclusion of costs for federal designation of coal ash as a hazardous substance. PSE acknowledged previously that the pending Coal Combustion Residual rules could result in up to \$125 million in annual costs for disposal of hazardous coal ash. PSE has already paid \$25 million in a settlement for contaminated groundwater. PSE is currently facing two state-based legal challenges on coal ash and the contamination continues.

No consideration of potential SO2 non-attainment costs and underestimation of other air quality liabilities such as compliance with federal haze rules and new federal air toxics rules.

No accounting for anticipated increasing coal mining costs. Much of the coal remaining onsite after 40 years of mining is increasingly hard to obtain, and will require additional costs.

PSE's planning process lacks transparency. PSE has refused to fully disclose its modeling data or analyses, making it impossible for the public to very or refute PSE's methodology. In some cases PSE has not justified why its costs assumptions for Colstrip are different from costs documented by the plant's other owners.

PSE's conclusion that Colstrip is "economic" is overly simplistic and misleading. Several of the scenarios that PSE ran showed that continuing to operate Colstrip for the next 20 years is in many cases more expensive than transitioning to other, clean generation alternatives.

This is not where we want our next energy dollars spent. I urge the commission to critically evaluate PSE's long range plant and have them incorporate the true cost of coal.

Sincerely,

Jovon Crain 6507 E N St Tacoma, WA 98404-3440 (253) 473-1320