

From: [Dr. O'Halloran](#)
To: [UTC DL Records Center](#)
Subject: Comment on dockets UE-160918 and UG-160919
Date: Monday, February 19, 2018 7:28:29 AM

Thank you for accepting my comments on dockets UE-160918 and UG-160919, concerning Puget Sound Energy's (PSE) two year integrated resource plans for electric and natural gas service in Washington State.

I request that the Washington State Utilities and Transportation Commission require PSE to set a much earlier retirement date than currently envisioned for Colstrip Units 3&4, no later than 2025. Allowing these units to operate until 2035 is unconscionable and would make it virtually impossible for Washington State to meet its legally binding greenhouse gas emission reduction target in 2035. Requiring a 2025 closure date would also be consistent with Governor Inslee's Executive Order 14-04, which directed the UTC to use the full scope of its authority to reduce the consumption of coal fired electricity in Washington. Moreover, the continued operation of these units beyond 2025 would require expensive air pollution control upgrades. These added capital costs would not make the units part of a 'least cost energy mix', as the UTC is statutorily required to consider in approving utility integrated resource plans. The sooner these units are done the better we have a chance to avoid climate catastrophe.

Furthermore, I request that the UTC work with PSE, and all of the Washington utilities it regulates, to be on a course to replace retiring coal immediately with clean, renewable energy. The capital investment decisions our utilities make over the next 20 years will have implications far beyond that time period. If new natural gas plants are built to replace what is currently in operation, or if current plants are expanded, it would be extremely difficult for Washington to meet its 2035 and 2050 greenhouse gas emission reduction targets. The known leakage of methane emissions during the natural gas production and manufacturing process could very likely make natural gas as bad as or worse than coal from a climate change standpoint.

Non-extractive, non-fossil fuel energies are the most economic resources that all utilities in Washington should strive to produce in their long-term resource plans. PSE's own leadership and success in the procurement of renewable energy, energy storage, demand reduction, and energy efficiency demonstrate the cost effectiveness and viability of these resources. Moreover, the response to bids for power by major utilities nationwide such as Xcel Energy in Colorado show the ability of solar and wind combined with energy storage to compete with fossil fuels.

A future in which we provide fuel to our homes, offices, and factories that also preserves our climate, protects our oceans, and prevents heart and lung disease can be achieved if we act responsibly now to achieve it.

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