

**WASHINGTON  
ENVIRONMENTAL  
COUNCIL**

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## UTILITIES AND TRANSPORTATION COMMISSION OPEN MEETING OCTOBER 10, 2013

## WASHINGTON ENVIRONMENTAL COUNCIL COMMENTS ON

## PUGET SOUND ENERGY INTEGRATED RESOURCE PLAN - DOCKET # UE-120767/UG-120768

Washington State has committed to reducing greenhouse gas emissions and transitioning to cleaner energy sources, with emissions limits set in statute for 2020 and beyond. Governor Inslee has taken up this challenge, and is working with the legislatively-established Climate Legislative and Executive Workgroup to identify the policies needed to meet the emissions limits set in statute.

Washington State's carbon footprint includes the emissions from Puget Sound Energy's out of state coal plants. As the climate work group reviews the breakdown of Washington's current emissions it is evident that in order to meet our statutory commitment to addressing climate pollution, we need to responsibly transition off of coal power.

Utility-scale planning and investments are critical to Washington doing our share to combat the climate crisis. Many groups and individuals in Washington are trying to do everything they can to reduce their carbon footprint, from increasing energy efficiency in their homes to reducing the fuel use of vehicle fleets. Yet they don't have control over who provides their electricity and where that electricity comes from. Puget Sound Energy's Integrated Resource Plan represents a significant slice of Washington's energy investment dollars, and as such can be an important factor in helping achieve the state's commitment to address climate pollution and transition to clean energy.

Washington Administrative Code directs the UTC to consider that the lowest reasonable cost scenarios include the cost of risks associated with environmental effects, explicitly including emissions of carbon dioxide. Washington citizens and businesses are already feeling these costs - the real, economic impacts of climate change and excessive carbon emissions. These costs are getting worse and they are accelerating. Considering only the costs to the utility of action while ignoring these directly-related costs to Washington residents, many of whom are Puget Sound Energy customers, does not seem like an appropriate assessment of "least-cost planning". We urge the UTC to direct Puget Sound Energy to consider the current and future costs of carbon pollution as they craft their Integrated Resource Plan.

Washington Environmental Council and Puget Sound Energy share a constructive working relationship and we acknowledge and appreciate the investments Puget Sound Energy has made in renewable energy, energy efficiency and encouraging stewardship and environmental responsibility in their customer base. We look forward to ongoing work together to make Washington State a leader in renewable energy.

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