



December 18, 2015

Dave Danner, Chairman  
Washington Utilities and Transportation Commission  
Attention: Records Center  
PO Box 47250  
Olympia, WA 98504-7250

Re: Docket ID Nos. UG-141169 and UE-141170, *Puget Sound Energy Integrated Resource Plan*

Dear Mr. Danner

On behalf of the National Parks Conservation Association's (NPCA) one million members and supporters we request that the Washington Utilities and Transportation Commission (UTC) disapprove Puget Sound Energy's (PSE) Integrated Resource Plan (IRP) relative to its reliance on Colstrip Steam Station as a source of future power generation. PSE's Colstrip coal plant in Montana has polluted the Northern Rockies region and beyond, impairing the air quality and disrupting the climate at treasured Class I areas including Yellowstone, Glacier, Grand Teton, Wind Cave, Badlands and Theodore Roosevelt national parks for over four decades. In order for Colstrip to comply with the Clean Air Act's Regional Haze Rule it must significantly reduce its visibility-impairing emissions. Because there is no current plan in place to adequately mitigate Colstrip's contribution to visibility impairment and thereby meet PSE's regional haze obligations, we believe the IRP is flawed.

The Regional Haze Rule is a long term program designed to achieve the Clean Air Act's mandate of restoring natural air quality to America's prized national parks and wildernesses. To accomplish this objective the Clean Air Act specifies that human caused pollution must be reduced until the mandate is achieved. Because Colstrip continues to have a demonstrable impacts in at least half a dozen such Class I areas, it is not a matter of whether but when pollution reductions will be required from the facility.

In August 2013, NPCA submitted a letter with attachments to the UTC detailing our concerns regarding Colstrip's regional haze pollution, which unfortunately have yet to be remedied. Through this submission we update and reinforce the contents of our August 2013 letter, attached for your reference. Since the concerns we outlined remain unaddressed, at best PSE's compliance with all necessary environmental regulations is in question. Because compliance with all applicable laws must be considered in the updating of the IRP and PSE has failed to remedy or even address its contributions to visibility impairment at multiple treasured national parks and wildernesses in the region, the IRP cannot pass muster. Moreover, because the IRP continues to rely on Colstrip, a heavily polluting source of power, the IRP is incompatible with the express will and direction of Washington state citizens and elected officials in pursuit of clean, responsible energy goals.

Although the Environmental Protection Agency issued a regional haze plan for Montana in 2012, the United States Court of Appeals for the Ninth Circuit recently remanded the plan back to the agency to revisit its decision allowing Colstrip units 1 and 2 to evade Best Available Retrofit Technology (BART) requirements. The Court found EPA's BART determination pertaining to Colstrip to be arbitrary as, amongst other things, the agency failed to justify its decision to allow Colstrip to bypass significant reductions in visibility impairing emissions of nitrogen oxides. Had EPA's analysis been satisfactory, we believe the agency would have required Colstrip to install Selective Catalytic Reduction (SCR) technology to control emissions of nitrogen oxides and scrubbers to control sulfur dioxide. EPA is now performing that analysis and will likely issue a new plan in 2016.

Given the arbitrary nature of EPA's Montana haze plan decision, it is inconceivable that on remand the agency would permit Colstrip to continue releasing excessive emissions for which emission controls are readily available, regarded as industry standard (SCR for example is in use at over 250 facilities nationwide), and cost effective. To comply with the Clean Air Act, EPA must require adequate emission reduction requirements at Colstrip units 1 and 2 to reduce the facility's visibility impairing pollution no later than five years after EPA issues the final haze plan, or 2021. Moreover, the Regional Haze Rule requires continuous reduction in visibility impairing pollution to make reasonable progress towards the national goal of eliminating anthropogenic visibility impairing pollution. To comply with the Regional Haze Rule in the next regional haze planning period, commencing in 2018, the implementation plan for Montana must lead to similar reductions as should be required in this planning period for units 1 and 2 at Colstrip units 3 and 4. It follows that the UTC must consider anticipated costs of compliance with Regional Haze Rule requirements for all Colstrip units.

NPCA understands that alternative paths are available in lieu of emission controls that would achieve necessary visibility improvements while avoiding continued release of climate disrupting pollutants that also harm national parks. To the extent that alternative measures produce adequate visibility benefits and climate gains and do not otherwise compromise national park resources, NPCA supports such alternative measures, including PSE's enhanced efficiency and use of renewable energy sources instead of coal. However, because PSE's IRP fails to adequately account for or plan for the mitigation of its Class I impairing pollution, the Washington Utilities and Transportation Commission must disapprove PSE's IRP for the continued use of Colstrip as a generation resource.

Thank you for your consideration.

Sincerely,



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/s/

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