

Higgins, Joni (UTC)

From: Kouchi, Roger (UTC) on behalf of Public Involvement (UTC)
Sent: Friday, October 11, 2013 3:00 PM
To: UTC DL Records Center
Subject: FW: Comments to Washington State Utilities and Transportation Commission: Puget Sound Energy: 2013 Integrated Resources Plan

From: wilcoxj@katewwdb.com [mailto:wilcoxj@katewwdb.com]

Sent: Friday, October 11, 2013 1:40 PM

To: Public Involvement (UTC)

Cc: Bruce Treichler

Subject: Comments to Washington State Utilities and Transportation Commission: Puget Sound Energy: 2013 Integrated Resources Plan

According to the information available on the [Washington state Utilities and Transportation Commission website](#):

"The UTC regulates private, investor-owned electric and natural gas utilities in Washington. It is the commission's responsibility to ensure regulated companies provide safe and reliable service to customers at reasonable rates, while allowing them the opportunity to earn a fair profit."

We at Wild Game Fish Conservation International have concerns regarding Puget Sound Energy's 2013 Integrated Resources Plan (IRP) as it pertains to the Colstrip electric plant and its reliance on coal. They include documented risks to public and environmental safety, especially related to contaminants released into the air we breathe, the soil used to grow our food and the water we drink.

These same contaminants significantly impact wild ecosystems and the cultures, communities and economies that rely on them.

Continuing to rely on coal extraction, transportation and burning to generate electricity must end in order to reverse the negative impacts to public health and to our environment.

As evidenced below from the [2013 IRP](#), Puget Sound Energy expects Washington's Utilities and Transportation Commission to believe that it continues to be cost effective to produce electricity via the problematic Colstrip facility:

"There is long-term uncertainty for coal generation in general, but Colstrip reduces cost and market risk in most likely scenarios.

A number of factors may impact the future operations of coal-fired generation throughout the United States; this IRP investigates their potential impact on the economic operation of PSE's Colstrip facility. For this analysis, PSE developed four environmental compliance cost cases to test the economic viability of Colstrip under a variety of potential regulatory requirements. Overall, the analysis found that Colstrip reduces cost and market risk for our customers.

Three key risk factors have the greatest effect on Colstrip's performance as an economic, least-cost resource: very high CO2 costs, very high disposal costs for coal combustion residuals, and very low natural gas prices for a very long time. At this time, the analysis indicates that continuing current operations at Colstrip saves PSE customers about \$131 million per year. Put a different way, replacing Colstrip with another resource would result in approximately a 5 percent annual rate increase, apart from any other rate pressures. Conditions may change in the future, but for this planning cycle, it does not appear PSE should begin developing resources to replace Colstrip. "

As presented during public testimony associated with Puget Sound Energy's 2013 IRP, nothing could be further from reality as the true operational and social costs of operating the coal-fired Colstrip facility are grossly and intentionally underestimated by hundreds of millions of dollars per year.

Puget Sound Energy's continued fraud and risks to public and environmental health must end as they are absolutely unacceptable to those who expect our elected and appointed officials to protect us and our treasured natural resources from greed-driven atrocities.

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