

Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250  
Docket #UE-151592

RE: Comments on Colstrip Proceeding

Dear Chairman Danner and Commissioners Jones and Rendahl:

Thank you for initiating an investigation into the retirement and clean-up costs of the Colstrip coal plant owned by Puget Sound Energy (PSE), Avista, Pacific Power and others. We are writing today in support of the petition calling for a comprehensive proceeding into the mounting financial risks posed by Colstrip for electricity customers. With the recent federal Clean Power Plan, our Governor's call for a carbon cap, and local governments committing resources to combat climate change, it is time for our utilities to end their reliance on coal. We can replace that power with clean energy from regional sources that will create long-term resource stability, protect the climate and create good jobs.

As you know, Colstrip's coal ash waste ponds are a big unknown liability for ratepayers and may be the single biggest environmental hazard and cost. During the last state legislative session, PSE estimated in one version of the legislation that clean-up costs could be \$500 million or more. Determining the true extent of this liability is important. This is why I support your investigation and the petition filed by the Sierra Club, Climate Solutions and Washington Environmental Council.

However, the liability for ratepayers is not limited to the coal ash problem. Colstrip faces carbon regulations, regional haze retrofits, possible sulfur regulations, increasing fuel costs, increasing production costs and there are cheaper, cleaner alternatives to the mounting costs of Colstrip.

In addition to the fundamental ratepayer protection that this Colstrip proceeding represents, it also serves as a venue to address our climate concerns. As you know, the Climate Legislative and Executive Workgroup (CLEW) determined that coal-based electricity is the second largest source of carbon emissions in Washington. Most of these coal-based emissions come from Colstrip because it is the single largest individual carbon emitter in the Northwest, equal to the carbon emissions from approximately half all the passenger cars in Washington State.

The final EPA rule for the Clean Power Plan (CPP) clearly puts additional pressure on Colstrip. Of the six power plants in Montana that are regulated by the CPP, Colstrip represents 85% of

total emissions. The final reduction target for Montana for these six plants is 47% reduction. It is hard to conceive of a compliance pathway that does not include Colstrip.

We believe the petition for the Colstrip proceeding is very timely. We need to know the full suite of liabilities that are present for our ratepayers. And we need to make meaningful headway on climate change.

Thank you for taking the important first step on the coal ash liabilities. Now we hope you are able to move quickly with this Colstrip proceeding.

Sincerely,

**Environmental and Other Non-Profit Organizations**

Paula Del Giudice, Executive Director, Pacific Northwest Pollution Prevention Resource Center

Jill Mangaliman, Executive Director, Got Green

Matt Petryni, Clean Energy Program Manager, RE Sources for Sustainable Communities

Jaimes Valdez, Policy Manager, Northwest Sustainable Energy for Economic Development

Julianna Fischer, President, Western Washington University Students for Renewable Energy

**Elected Officials**

Dave Asher, Council Member, Kirkland City Council

Shelley Kloba, Council Member, Kirkland City Council

State Rep. Joan McBride (D-Kirkland)

Paula Waters, Council Member, Woodinville City Council

Michael Lilliquist, Council Member, Bellingham City Council

Jack Weiss, Council Member, Bellingham City Council

Dan Hammill, Council Member, Bellingham City Council

**Businesses**

Linda Berensten, Owner, Orca Books

Brandon Byron, Bainbridge Technology Solutions

Judd Hardy, No Sweat Equity

Barbara Kelson, Apple Farm Village

Jack Lamb, Aslan Brewing Co.

Wendy O'Connor, O'Connor Architects

Linda Owen, Maui Beach Home Rentals

Kristina Ricotta, Vetiver Organic Hair Spa

Andrew Roby-King, Roby King Galleries

John Sherwin, Rimini Software