

January 14, 2017

Dear Commissioners,

You have a tough job before you, one that is technically and politically complex. **Thank you** for advocating on our behalf for safe, reliable energy that is also in alignment with our state's commitment to lowering our carbon emissions. You understand that we have entered a potentially irreversible climate crisis¹ and that Washington State is leading the way to a renewable energy future. We are living in pivotal times, with the current system of energy generation and distribution struggling to transform itself. In my view, the biggest barrier to adopting many of the technological, carbon-saving advances is the close relationship that PSE enjoys with the fracked gas industry. Related to this, is shareholder pressure for short-term returns from its investor-owned utility which makes gas extraction for energy generation financially attractive, though destructive. These observations are beyond the scope of the IRP process, but must be mentioned for context, because the IRP process is insufficient to fully plan for the multi-layered innovations that will be a part of the renewable energy future.

That begin said, here are a few of my specific concerns about the 2017 IRP.

1. The IRP does not once refer to **methane**, the real name for "natural gas" in any of its 384 pages. It does not acknowledge that **methane** is 86 times more potent than CO₂ for its heat trapping properties over a 20 year horizon². Neither does it mention either that according to a peer reviewed study by Robert Howarth at Cornell University, **methane leaks** are pervasive, especially at the sites of extraction. There is evidence that any gains made in reducing CO₂ by taking coal plants off-line are negated by potent fugitive methane from replacement with gas. Nor does the IRP mention the impact on land or water at the site of extraction by the

¹ IPCC, 2013: Summary for Policymakers. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

² Report by the Intergovernmental Panel on Climate Change (IPCC) in 2013

method known as **hydraulic fracturing**. We cannot substitute gas for coal. It must be renewables, conservation and associated technologies.

2. Although the tone of the PSE's executive summary is sunny and seemingly cooperative concerning their desire to use renewable and conservation strategies, much of the document focuses heavily on (fracked methane) thermal generation and distribution. In the details one gets the impression they intend to do business as usual.
3. Although you, the WUTC, gave guidance in March 2017 in a policy paper to **seriously incorporate energy storage** in planning³, I see little real commitment by PSE to these technologies, even though energy storage at multiple scales is a very promising **alternative to polluting gas peaker plants**. This despite the fact that energy storage supported by incentive pricing is having a positive impact in California, in industrial and residential applications, especially for evening out demand. Where there's a will there's a way! What **creative strategies** can be utilized to have more energy storage replace generation? PSE needs to go back to the drawing board and ask for regulatory, legislative and technological support if necessary, to sketch out plans for incorporating storage (and other innovations such as demand response, smart grids, deep conservation etc.)
4. PSE is leaving the door open for the LNG gas tank facility in Tacoma (currently being built illegally on **Puyallup tribal land**) to be used for fueling an unbuilt methane peaker plant. This is not acceptable.
5. PSE points out the uncertainty of regulatory environment. There is no argument about this. However, this uncertainty is the best reason to **heartily embrace** the more ambitious decarbonization goals, as this position exposes rate payers to **less risk of stranded assets** from outdated and outlawed polluting energy generation infrastructure.
6. In short, PSE is failing to imagine their place in a **bright, jobs-rich, innovative energy future**. They would do well to shed their short term, pro-pollution shareholders and attract investors with more vision and care for a healthy life sustaining planet. This is of course, outside of the IRP

³ U-161024 UE-151069 DRAFT Energy Storage Policy Statement Mar 2017

scope. However, outside “business as usual” is where the we will find the solutions.

Dear commissioners, you three are in position to lead the transition to a fossil free future and a safe and sane climate. Please ask PSE to go back to the drawing board to create practices that avoid the use of any additional fossil fuels. Thank you for considering my comments.

Respectfully,

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