

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Puget Sound Energy's
2015 Integrated Resource Plan

Docket UE-141170

**SIERRA CLUB REQUEST TO EXTEND DEADLINE FOR
WRITTEN PUBLIC COMMENT**

1. Sierra Club hereby requests that the Washington Utilities and Transportation Commission ("Commission") extend the deadline to file written comments on Puget Sound Energy's ("PSE") 2015 Integrated Resource Plan ("IRP") filed in docket # UE-141170. Sierra Club requests that the Commission extend the deadline to submit written comments from January 15, 2016 to February 15, 2016.
2. The Commission issued its notice on December 9, 2015 setting the current deadline to submit written comments by January 15, 2016 and scheduling an open meeting on March 4, 2016 to review PSE's 2015 IRP. Sierra Club requests an extension of the written comment deadline due to the intervening holidays.
3. The Commission is well aware that PSE's recent IRP submissions have garnered a high level of interest from the public, in large part due to PSE's ownership of the Colstrip coal plant in Colstrip, Montana. Sierra Club, numerous other consumer, civic and conservation public interest groups, government organizations, businesses, and individuals submitted written comments and attended the Commission's last public meeting addressing PSE's 2013 IRP.
4. Sierra Club expects an even greater level of interest and engagement in this year's consideration of PSE's IRP. For example, King County and nine mayors in King County recently released their updated Strategic Climate Action Plan that explicitly calls upon

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PSE to move beyond all coal-generated resources by 2025. Sierra Club is aware that King County has a strong interest in PSE's 2015 IRP. In addition to King County, the Commission also received comments on the 2013 IRP from the City of Bellingham, the City of Bainbridge and the City of Olympia. These three cities plus King County represent the majority of PSE customers.

5. Sierra Club is requesting the extension due to the proximity to the end of year holiday period. Many organizations and local governments have approval processes that they must go through before they can submit official comments on government processes. Posting notice on December 9, 2015 for a comment period that is due on January 15, 2016 functionally gives less than 30-day notice given the December holiday season when many businesses and governments are closed or have significantly reduced staff time.
6. Sierra Club also notes that PSE did not provide final drafts of its IRP to its IRP Advisory Group. Those stakeholders who were actively engaged in the development of this IRP for 18 months did not have the opportunity to review and comment on key chapters of the 2015 IRP. Many organizations are still reviewing the final draft, let alone disseminating their findings to their membership and seeking approval for final comments.
7. Ratepayers, businesses, consumer groups, non-profits and concerned citizens deserve the right to meaningful public engagement, especially on an issue where such demonstrable concern has been overwhelming. To truncate the comment period for the IRP that has received the most concern of any IRP before the Commission would be a disservice to citizens, ratepayers and good public process.

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8. For the foregoing reasons, Sierra Club respectfully requests that the Commission grant an extension of the public written comment period to Monday, February 15, 2016.

December 18, 2015

Respectfully Submitted,



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