Docket UE-210795
February 23, 2022
Comments on PSE's CEIP from Dan Mathias, Mukilteo, WA

Thank you for the opportunity to review and comment on Puget Sound Energy's (PSE) 2021 Clean Energy Implementation Plan (CEIP). PSE is the largest power utility in the state of Washington[1] and relies on coal fired power more than nearly all other power utilities in the state [2]. Consequently, PSE emits significantly more CO2 emissions than any other power utility in our state[2]. Given this, it is very encouraging to see that PSE is committed to retiring all of its coal fired resources by 2025 and to eventually have a 100% renewable power supply.

I do, however, have a few commits/suggestions for your consideration:

1) On page 4, PSE requests Washington utility and Trade Commission (WUTC) approval of its interim target: 63% of its retail sales be supplied by renewable energy. Retail sales account for just slightly over PSE's power supply in 2020[2]. This means that approximately 32% of PSE's power supply would be renewable energy in 2025. Yet, 34% of PSE's power supply is renewable now[3]. The CEIP should be revised to explain how PSE can comply with the state law requiring retirement of all coal-fired resources by 2025 if they have fewer renewable resources in 2025 than today.

2) On page 4, PSE proposes: 1,073,454 MWH of energy efficiency, 800 MW of new utility scale renewables, 80 MW of new distributed solar resources and 23.7 MW of demand response by 2025. To offset the retirement of all PSE's coal-fired resources, these new power supplies would need to operate at full power an average of nearly 22 hours per day. This is not feasible for renewable power sources. For example, in the Puget Sound region an 8KW solar collector only produces approximately 8,600 KWH per year[4]. The CEIP should be revised to clarify how these target resources can fully offset retirement of PSE's coal powered resources.

3) There are more than 45,000 electric vehicles registered in King County. Many of these vehicle owners likely recharge their batteries using PSE power. A Tesla 3 uses 24 KWH to drive 100 mile[6]. Assuming 1,000 miles driven per month, recharging an electric vehicle could increase the average PSE household energy use by 28%[7]. Electric vehicles, including those purchased in the future, make it more difficult for PSE to achieve their clean energy targets. I suggest PSE should adopt policies to encourage their customers to invest in solar collectors rather than electric vehicles. PSE also should encourage customers that already own an electric vehicle, to

recharge their electric vehicles at supercharging stations served by utilities that are nearly fossil free.

4) Change the first sentence in paragraph one on page 139 to read "…carbon free electricity supply by 2025".

If you have any questions regarding my comments, please contact me at dananddebe@yahoo.com or (425) 422-8286.

[1]www.pse.com/en/pages/energy-supply/electric-supply

[2]www.commerce.wa.gov/growing-the-economy/energy/fuel-mix-disclosure/

[3]www.pse.com/en/pages/energy-supply/electric-supply

[4]pvwatts.nrel.go

[5]data.wa.gov/Demographics/Electric-Vehicles-By-County/smxa-ttv3

[6]fueleconomy.gov

[7]www.pse.com/green-options/Renewable-Energy-Programs/solar-choice