

From: [Plummer David F.](#)
To: [Public Involvement \(UTC\)](#)
Cc: ceip@pse.com; [court Olson](#); don.m.marsh@hotmail.com; [Lipscomb Ruth](#)
Subject: PSE 2021 Clean Energy Implementation Plan (CEIP)
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External Email

Hi there!

PSE filed their CEIP with the Commission on 17 December 2021; following are my comments and questions regarding that plan. I urge the Commission to consider these comments, and to provide responses to them.

1. What does PSE expect the increases to be in residential customer electricity tariffs and rates when all the actions described in their 2021 CEIP are fully implemented?
2. Does PSE expect that residential and commercial natural gas price tariffs/rates will be impacted in any way when all the actions described in their 2021 CEIP are fully implemented; if so, what kind of impacts may occur?
3. Chapter 5, Table 5-3 of the Plan fails to identify the life-cycle costs (acquisition, ownership, and retirement costs, not including SCGHG costs) for the “With CETA” options, and the associated levelized energy costs (assuming a 30-year economic ‘service life’ for the calculations). PSE should be required to prepare a separate appendix to add the necessary tabulations, descriptions, and references that describe the life-cycle and levelized energy cost calculation methodology and results. The main body of the Plan should also be revised to include a discussion of these costs (reference RCW 39.35B).
4. Chapter 5 of the Plan is totally misleading regarding the likely quantitative impacts of the CEIP provisions on PSE’s rate-paying customers; this chapter should be revised to include more credible estimates of rate impacts due to the deployment of new CEIP resources and procedures. This revision should include a discussion of PSE’s estimates of price elasticity effects resulting from the incorporation of rate increases necessary to pay for the CEIP changes.
5. Add ‘SCGHG’ term and description to Plan's list of Acronyms & Definitions.
6. Add a new chapter that describes in reasonable detail PSE’s assumptions about the PSE service area climate expected during the next several decades, including supporting rationale, data and references.

RSVP,

David F. Plummer

14414 NE 14th Place

Bellevue, WA. 98007