



May 13, 2021

Washington Utilities and Transportation Commission
621 Woodland Square Loop
Lacey, WA 98503

Subject: Docket UE-200980

Members of the Utilities and Transportation Commission,

I am writing on behalf of Sound Transit to provide comment on the joint settlement for Docket UE – 200980 as it relates to Puget Sound Energy’s Green Direct program. Sound Transit has subscribed to both phases of Green Direct and has enrolled all existing properties served by PSE into the program under two 10-year contracts. As a result, we currently operate the only light rail system in the country running on 100% clean energy.

We are reaching out to the commission to share our concerns with the proposed change in methodology for the Energy Charge Credit calculation, which is the portion of the joint settlement that is relevant to Green Direct.

Although Sound Transit anticipated and planned for appropriate adjustments in the Energy Charge Credit amount based on market conditions, it was not anticipated that the methodology previously agreed upon to determine the Energy Charge Credit amount for Green Direct would change. As a result of the proposed changes, Sound Transit is anticipating significant increases to projected utility costs for sites served by Puget Sound Energy.

The change in the calculation methodology for the Energy Charge Credit in the Green Direct program will negatively impact the program’s financial performance for our agency. Instead of the modest financial benefits we had projected, we now anticipate significant additional costs for electricity. As a result, our agency will incur new energy costs that were neither anticipated nor budgeted, and this is especially challenging in the context of pandemic-related agency efforts to reduce costs to deliver our capital expansion program.

CHAIR

Kent Keel

University Place Councilmember

VICE CHAIRS

Dow Constantine
King County Executive

Paul Roberts
Everett Councilmember

BOARD MEMBERS

Nancy Backus
Auburn Mayor

David Baker
Kenmore Mayor

Claudia Balducci
King County Council Chair

Bruce Dammeier
Pierce County Executive

Jenny Durkan
Seattle Mayor

Debora Juarez
Seattle Councilmember

Joe McDermott
King County Council Vice Chair

Roger Millar
*Washington State Secretary
of Transportation*

Ed Prince
Renton Councilmember

Kim Roscoe
Fife Mayor

Nicola Smith
Lynnwood Mayor

Dave Somers
Snohomish County Executive

Dave Upthegrove
King County Councilmember

Peter von Reichbauer
King County Councilmember

Victoria Woodards
Tacoma Mayor

CHIEF EXECUTIVE OFFICER

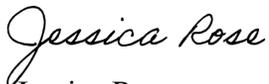
Peter M. Rogoff

Consequently, we respectfully request the UTC review the financial impact to the Green Direct program and pause further action on the methodology for the Energy Charge Credit pending the involvement of Green Direct participants. The State and the environment benefit greatly from the Green Direct program, and this action makes it more challenging to undertake clean energy projects. For this reason, we would appreciate your reconsideration of this proposal.

Sincerely,



Perry Weinberg
Deputy Executive Director & Senior Legal Counsel
Environmental Affairs & Sustainability
Sound Transit



Jessica Rose
Utilities & Resource Conservation Manager
Operations Support Services
Sound Transit

cc: Alex Soldano, Director of State Relations