

November 4, 2019

To: Irena Netik – Puget Sound Energy (PSE) Director of Energy Supply Planning and Analytics

Cc: Jay Balasbas – UTC Commissioner  
Rachel Brombaugh – King County Executive Energy Policy & Partnerships Specialist  
Brad Cebulko – UTC Staff  
Carla Colamonici – Regulatory Analyst, Public Counsel Division  
David Danner – Utilities and Transportation (UTC) Commission Chair  
Lisa Gafken – Assistant Attorney General, Public Counsel Unit Chief  
Steve Johnson – UTC Staff  
Ann Rendahl – UTC Commissioner  
Deborah Reynolds – UTC Staff  
Kathi Scanlan - UTC Staff

Subject: 2019 IRP Technical Input – IRP analyses should meet state CO2 reduction goals

Note: The TAG acknowledges the WUTC Staff petition for an IRP schedule exemption. This technical input is submitted in response to PSE's commitment to "continue to ... maintain and respond to public input". This technical input should be considered an integral part of the collection of 2019 PSE IRP documents. We appreciate PSE's commitment to also include these technical inputs in the 2021 PSE IRP.

"The legislature finds that Washington must address the impacts of climate change by leading the transition to a clean energy economy."<sup>1</sup>

"Absent significant and swift reductions in greenhouse gas emissions, climate change poses immediate significant threats to our economy, health, safety and national security."<sup>2</sup>

"The legislature declares that utilities in the state have an important role to play in this transition, and must be fully empowered, through regulatory tools and incentives, to achieve the goals of this policy."<sup>3</sup>

It is clear that Washington State elected leaders have clear, quantified goals for carbon emission reductions. Results Washington<sup>4</sup> says we will "reduce greenhouse gas emissions to at

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<sup>1</sup> Clean Energy Transformation Act, Section 1(1)

<sup>2</sup> Ibid, Section 1(3)

<sup>3</sup> Ibid, Section 1(5)

<sup>4</sup> <https://results.wa.gov/measuring-progress/outcome-measures/combating-climate-change>

least 25 percent below 1990 levels by 2035". Recent legislation sends an equally clear message that utilities are expected to contribute to this objective. Given this expectation, what are PSEs top level contributions to this outcome?

As TAG members, we formally request that PSE post this letter on their 2019 IRP website and provide a written response to these questions:

- Has PSE identified their carbon emission reduction requirements needed to comply with Washington State carbon emission reduction goals and timelines?
- What carbon emission reduction derived requirements apply to the PSE electricity business?
- What carbon emission reduction derived requirements apply to the PSE gas business?
- Will PSE strive to accelerate their compliance with the Clean Energy Transformation Plan?
- Is PSE willing to commit to a stretch goal date to achieve 100% carbon free electricity?
- If yes, when will PSE publish this stretch goal date?
- If yes, will PSE constrain its electric IRP to achieve this stretch goal date?
- Will PSE constrain its gas IRP to stay within Washington State carbon emission reduction goals?
- Will PSE publish a gas IRP carbon emission reduction curve, showing its gas business contribution to Washington state carbon emission reduction goals and timelines?
- Will PSE publish a gas IRP carbon emission reduction curve, showing the date and carbon reduction path to transition its gas business to 100% carbon free?

Respectfully submitted:

Doug Howell – Sierra Club Beyond Coal Senior Campaign Representative