

Comments on Commission Staff's Petition for Exemption From WAC 480-100-238(4)-(5) and WAC 480-90-238(4)-(5)

Docket number of this proceeding: UE-180607

Commenting party's name: James Adcock, Electrical Engineer

The title and date of the comment or comments:

Comments by James Adcock on the Response to the request from CENSE by Puget Sound Energy
10/29/2019

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I am a member of what PSE now calls "TAG" but previously called the "IRP" process. I have been so for about the last 10 years.

I write today neither to support nor oppose Staff's suggested exemption but rather to express a generalized concern that "Things Are Really Not Going Well" with this IRP cycle. In general, the quality of the PSE IRP process has gone down steadily for the last 10 years, and in the current IRP cycle, which implemented the PSE "TAG" restrictions, the quantity and quality of *actual* "technical" discussions has basically gone to zero. Even when there are strong disagreements between IRP participants and PSE -- as there has been for the last 10 years -- better a dialog than no dialog, and in the current IRP cycle there is basically "no dialog." PSE's position is basically "We Present, and You Listen." This is not what the plain language of the IRP laws requires. The IRP laws do not require a "Presentation" rather they require (in plain language) that utilities *Explain*. Recently for example, PSE took the position that the "good faith" progress ramp re CETA starts from their existing RE-newables position as a starting point, which then PSE indicates they believe they are in a "safe harbor" position for the next four years -- i.e. no new Non-Emitting resources are required for the next four years! I asked PSE to *Explain* that position, in that CETA does not deal with RE-newable resources (RE) but rather with Non-Emitting resources (NE) -- and therefore a consistent position would be that PSE should perform a 10-year nominal ramp (2020 to 2030) from their existing NE position to the 80% NE position required under CETA. But PSE refuses to *Explain* their seemingly inconsistent position. Further, the plain language of CETA does not provide a "safe harbor" possibility until 2030 -- and then *only* if a utility has previously maximized their NE acquisition possibilities. So (I believe) PSE should have no opportunity to "rest on their laurels" prior to 2030 -- and presumably not after then either.

[See PSE TAG Meeting #8 PowerPoint Slide 38, with PSE indicating there with the tiny double-arrow line that they believe their first tiny deficit on the "good faith" CETA ramp doesn't exist until 2023]

CETA would seem -- at least superficially -- to now align the desires, or at least the requirements, between utilities, IRP participants, the governor, and the UTC. Yet PSE still is "engaging in ploys." Which raises my concern that I believe PSE does not intend to make a "good faith effort" to meet the requirements of CETA, but rather to "slow walk" it while trying to defeat CETA by political process, or by

regulatory distortions. I ask that the UTC and Commissioners not allow this to happen, but rather to act forcefully "from day one" to make sure PSE "gets on with it" and actually follows the CETA rules and does not keep coming back with excuses about why real NE acquisition progress has not been made.

To make the problem concrete: My calculations show that PSE -- assuming that it makes full use of the next 10 years -- 2020 to 2030 -- needs (for example) to build 3 wind farms each 100 turbines of the largest 3 megawatt size EVERY TWO YEARS! Or a total of 15 such wind farms over the next 10 years. If UTC / Commissioners allow *any* amount of PSE "foot dragging" this will simply not be possible. I am not suggesting that "building 15 wind farms" is the only way PSE may meet requirements, but I hope that I am illustrating just how large a problem PSE has to solve -- IF PSE actually works diligently to meet the requirements of CETA, rather than acting outside of legal framework to oppose it.

I therefore ask UTC Staff and Commissioners to act now to make sure that PSE does not engage in additional "foot dragging" or excuse making.

And please *do something* to get PSE's IRP process back on track, so that IRP participants can in fact participate in a meaningful manner, so that we can have meaningful dialog even when we disagree, and so that PSE be required to *Explain* their position not simply to "Present", etc.

Thank you for any help you can give to these matters.

James Adcock