

November 5, 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 must address Listening Session inputs

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.

On May 30, 2018, at the Integrated Resource Plan Advisory Group (IRPAG) meeting, you proposed a Listening Session to address a number of issues raised by meeting attendees.

Nearly a year later, on May 22, 2019, PSE hosted a Listening Session with PSE VP David Mills. Mr. Mills opened the Listening Session by saying:

"I'm excited to be here ... and am specifically interested in your comments¹, and your thoughts and your concerns **as we are in the process of developing the 2019 IRP** for both our electric and natural gas portfolios." (emphasis added)

Since PSE, the TAG and the Listening Session attendees spent at least one labor year² on this activity, the first of its kind per Mr. Mills introductory statement, is it too much to ask PSE to clearly indicate how they will incorporate these inputs into their Integrated Resource Plan

¹ Note: PSE consistently refers to both public inputs and technical inputs from Technical Advisory Group members as "**comments**". It would be preferable, in this case, for VP David Mills to refer to Listening Session **inputs**.

² Two hour Listening Session, approximately 200 attendees = 400 hours plus discussion time at six or more TAG / IRPAG meetings with approximately 30 attendees = 45 hours for a total of 445 hours = 11.1 labor months.

process? Unfortunately, the TAG #8 meeting notes³ only indicate “that much of the feedback received from commenters⁴ would be incorporated into the resource plan” (see page 2).

One important point to make at this juncture, is the importance of PSE completing the 2019 Integrated Resource Plan. There is clear public interest in how PSE conducts their planning process, as evidenced by Listening Session attendance. Failure to complete the Integrated Resource Plan would fail to address these public concerns. Failure to complete the Integrated Resource Plan would also be a failure of representation.

Completing the Integrated Resource Plan is necessary but fails to address Listening Session inputs for two reasons (in addition to those already stated):

- Incorporating “much” of the Listening Session inputs in the IRP leaves unanswered the question of which inputs were included and which were discarded, and
- A quick review of the IRP process related requests from the Listening Session make it clear that answers to many of the customer concerns will not be discernable in the 2019 IRP document. For example:
 - o PSE must cite references to justify claims that renewables will become more expensive or confirm this is not a concern,
 - o Produce, retain and distribute audio recordings of IRP meetings, and
 - o PSE should not include expected energy efficiency incentives and new technologies as SB5116 "cost of compliance" costs.

As a PSE TAG member, I am committed to and have devoted many hours to achieve an open, honest, high integrity IRP process. I have invested my time to compile the list of Listening Session inputs⁵ regarding the IRP process with the expectation that PSE will match my investment of time and energy by modifying the IRP process to better respect the interests and concerns of your customers. Please do that by responding, in writing, posted on the IRP website, to the questions below.

- Which of the Listening Session inputs in the list below will PSE incorporate in the 2019 IRP?
- Which of the Listening Session inputs does PSE intend to incorporate in the 2021 IRP?
- For those Listening Session inputs that PSE will not incorporate, or will not fully incorporate, into an IRP, what is the rationale for not doing so?

Respectfully submitted,

³ https://oohpseirp.blob.core.windows.net/media/Default/19_Sept_TAG_8/IRP-TAG-Meeting-8_Meeting-Notes-FINAL.pdf

⁴ Note: PSE consistently refers to both public inputs and technical inputs from Technical Advisory Group members as “*comments*”. It would be preferable, in this case, for TAG meeting notes to refer to Listening Session *inputs*.

⁵ We will provide the matrix of which Listening Session participants provided which Listening Session inputs if so requested.

Listening Session inputs directly related to the Integrated Resource Plan process:

Category	Listening Session Input	Additional Information
Analysis integrity	IRP: PSE must use accurate data and current science	
	IRP: process must include the social cost of GHG's in all IRP scenarios	
	IRP: process must use the High Impact Social Cost of Carbon values	As an example, please see Virginia Lohr, Kevin Jones and Noah Roselander technical inputs on use of the High Impact social cost of carbon value.
	IRP: PSE must use accurate methane leak rates in their analysis	As an example, please see Rob Briggs technical inputs on questionable upstream methane leak data.
	IRP: PSE must use the latest renewable energy cost data in IRP analysis	As an example, please see Kate Maracas "Use latest renewable energy costs for IRP analyses" technical inputs.
	IRP: PSE should stop financially propping up the economically unfeasible Colstrip plant	As an example, please see Doug Howell's technical input on the lack of Colstrip economic viability.
	IRP: Renew all fossil fuel-based energy contracts with renewable energy-based contracts	As an example, please see Doug Howell and Kevin Jones technical input on coal-based electricity contracts.
	IRP: PSE must use the latest IPCC global warming potential data	
	IRP: PSE must cite references to justify claims that renewables will become more expensive or confirm this is not a concern	
	IRP: PSE must use current demand forecasts	
	IRP: must use a flat electrical demand forecast due to high energy efficient buildings	
	IRP: must include system wide demand response in their analyses	
	IRP: Move to a marginal value of conservation	

	IRP: must consider customer incentives to transition away from gas use	As an example, please see Bill Westre’s technical input on gas conservation.
	IRP: must consider customer incentives to improve home energy efficiency	
Social justice	IRP: PSE needs to place more emphasis on human life than electricity reliability	
	IRP: process needs to consider the health impacts of resource decisions	
	IRP: process must consider the impacts of fracking induced water pollution	
	IRP: process must consider the impacts of indigenous women treatment at man camps	
	IRP: process doesn't focus on humanity, only on getting UTC approval	
Cost equity	IRP: Unfair LNG plant cost burden to PSE customers	
Process integrity	IRP: process must include <i>dialogue</i> with TAG members & the public	As an example, please see Kate Maracas technical input on public participation.
	IRP: For every TAG input, document how it is incorporated or why it has not been	
	IRP: PSE needs to improve their public notification process	
	IRP: must present adequate data to assure that PSE is not building fossil fuel and transmission infrastructure without appropriate justification	As an example, please see Don Marsh's technical input on the questionable capital investment rationale for the Energize Eastside project (“Answer Energize Eastside questions”).
	IRP: PSE must make analysis parameters & data available to the TAG	As an example, please see Doug Howell's technical input regarding model data sharing through a non-disclosure agreement.
	IRP: PSE must address transmission issues brought up by the UTC in the 2017 IRP acknowledgement letter	
	IRP: Produce, retain and distribute audio recordings of IRP meetings	
Alignment with State climate objectives	IRP: PSE should commit to not replace coal-based electricity with some other fossil fuel	As an example, please see Doug Howell's technical input on moving directly from coal-based electricity to renewable energy.
	IRP: This 2019 PSE IRP must be a blueprint to 100% clean energy	

IRP: should remove all planned or in-process fossil fuel resources from their resource plans	
IRP: must not include expansion of fracked gas, including the Tacoma LNG facility	As an example, please see Doug Howell's technical input on meeting state CO2 reduction goals.
IRP: PSE needs to fully implement SB5116, not find ways around it	
IRP: PSE should not include expected energy efficiency incentives and new technologies as SB5116 "cost of compliance" costs	
IRP: process must include climate change as a factor in decision making	