

Kyla Boswell

From: Styrna, Jacquelyn <Jacquelyn.Styrna@pse.com>
Sent: Thursday, June 12, 2025 10:32 AM
To: Kyla Boswell
Subject: RE: Comprehensive Plan Update - PSE Map

EXTERNAL EMAIL

Dear Kyla,

Thank you for the opportunity to review the Chapter 5 Utilities draft.

1). Would you consider a less detailed description of the location of PSE substations {and other utility facilities, including CNGC natural gas pipelines}? The utility industry is experiencing security concerns as a whole, including a 70% increase in vandalism, thefts, suspicious activity, threats, trespassing, cybercrime, and physical attacks to the grid. While facilities may be noticeable driving along roads or even on google maps, it is best practice not to offer explicit details to the public. I've asked other municipalities to use vague language like "transmission, distribution, and several substations..."

Here are some recent examples of vandalism to electric or gas infrastructure:
[Two charged in Christmas Day attacks on Washington substations that cut power to 14,000](#)
[Western District of Washington | Two charged with attacks on four Pierce County power substations |](#)
[United States Department of Justice](#)
[Human-Driven Physical Threats to Energy Infrastructure](#)

2). PSE refers to "customers" as "ratepayers" interchangeably.

3). Next, in response to Ferndale's Comprehensive Plan Update, Puget Sound Energy (PSE) would like to submit the following comments:

Company Overview: Puget Sound Energy is an investor-owned utility provider of electric and natural gas service to homes and businesses in Puget Sound. With a 6,000 square mile service territory encompassing 10 counties, PSE provides power to more than 1.2 million electric customers and 900,000 natural gas customers.

PSE creates 46% of electricity from its own hydro, thermal, solar and wind facilities; the company has 3,500 megawatts of power-generating capacity, and purchases the rest of its power supply from other utilities, independent power producers, and energy marketers across the United States and Canada. In 2022, PSE provided 3,794,770 megawatt hours of renewable energy produced from wind and hydropower facilities. Electric and natural gas planning efforts are integrated and centered on providing safe, reliable, and efficient energy service.

Regulatory Environment: PSE's operations and rates are governed by the Washington Utilities and Transportation Commission (UTC). PSE electric utility options and standards are further governed by the Federal Energy Regulatory Commission (FERC), the National Electric Reliability Corporation (NERC), and the Western Electricity Coordinating Council (WECC). These respective agencies monitor, assess and enforce compliance and reliability standards for PSE.

Additionally, the Clean Electricity Transformation Act (CETA) became law in Washington State in 2019. CETA requires PSE provide electricity free of greenhouse gas emissions by 2045. The UTC and Washington Department of Commerce (WDOC) adopted CETA implementation rules that require utilities develop four-year plans known as Clean Energy Implementation Plans (CEIP) for clean energy investments, equitable distribution of customer benefits, and 100% clean energy by 2045. The first CEIP covers the time period of 2022-2025 and was filed with the UTC on December 17, 2021. It includes programs and investments such as expanding energy efficiency efforts, deploying new technologies, installing localized sources of clean energy, and investing in renewable energy. The PSE CEIP Library, including the 2023 Biennial Update:

<https://www.cleanenergyplan.pse.com/ceip-library>

Further government regulation includes the Washington Climate Commitment Act (CCA), which caps and reduces greenhouse gas emissions from large emitting sources to lower 95% of carbon emissions by 2050. This new program puts a price on greenhouse gas emissions emitted in the state and increases the cost to deliver electricity and natural gas to our customers.

At the local level, Ferndale residents rely on PSE and the City to coordinate efforts on ordinances and codes that protect existing energy facilities and embrace new clean energy technology. One of the primary intentions of the Utility Element is to ensure proper coordination of public land use planning and infrastructure planning by utility providers. Routine utility maintenance work—including vegetation management and avian protection—is required for regulatory compliance.

PSE Planning: Integrated Resource Plan (IRP): PSE plans years in advance to ensure we have the supply and infrastructure necessary to deliver clean, safe and reliable energy. An IRP is a twenty year view of PSE's energy resources, which is developed through a planning process that evaluates how a range of potential future outcomes could affect PSE's ability to meet our customers' electric and natural gas supply needs. The analysis considers policies, costs, economic conditions, physical energy systems, and future resource procurement. PSE's latest IRP was filed with the UTC on April 1, 2021 and is the foundation for PSE's first Clean Energy Implementation Plan (CEIP).

The 2021 IRP can be accessed at:

<https://www.pse.com/en/IRP/Past-IRPs/2021-IRP>;

PSE's 2023 Electric Progress Report: <https://www.pse.com/en/IRP/Past-IRPs/2023-IRP>

PSE 2030: PSE 2030 is in alignment with “Beyond Net Zero Carbon” 2045 goals and our commitments to safety, reliability, affordability and equity. PSE 2030 has four main focus areas of:

1. CETA Implementation
2. Natural Gas Decarbonization
3. Regulatory and Legislative Enablement
4. Customer Solutions

This bold plan to reduce carbon equivalent emissions to zero will leverage company energy resources and partner with jurisdictions to reach Washington GHG emission reductions goals below 1990 levels.

Energy Equity: Energy Equity ensures all PSE customers can access the benefits of the clean energy transition. This includes identifying inequities across the energy system, reducing barriers and burdens, and prioritizing the needs of highly-impacted communities and vulnerable populations. PSE is incorporating equity by tracking data, developing new processes, and making organizational changes to customer energy delivery. Hence, municipal code language that makes clean energy accessible is key.

Distributed Energy Resources: PSE offers the Distributed Energy Resources program to commercial customers in order to fulfill our commitment to a clean energy future. DER's aim is to support the development of customer-owned renewable energy projects that generate between 100 kilowatts and 5 megawatts to interconnect to the PSE electrical distribution grid. Current federal and state laws require the interconnection customer to be responsible for all costs related to connecting their system to PSE's power grid. Therefore, PSE works with customers to ensure the interconnection process is efficient, while maintaining a grid that is safe and reliable. As customers move toward increased renewable energy, local renewable energy generating resources may result in additional infrastructure required to deliver energy to the grid in a safe, effective, and reliable manner. Additionally, considering energy storage, both residential and utility scale, will have the potential of providing additional benefits for renewable energy sources & providing benefits to the community.

As the City of Ferndale conducts the Update, PSE encourages the City to consider the following documents:

- PSE Integrated Resource Plan (IRP) – 25 year Long-range Plan
- PSE Clean Energy Action Plan (CEAP) – 10 year Strategy Plan
- PSE Clean Energy Implementation Plan (CEIP) – 4 year Plan

Further, PSE poses the following questions to the City for consideration:

- How will the Comprehensive Plan meet requirements for the 2019 Washington Clean Energy Transformation Act (CETA)?

- How will Ferndale implement Transportation Electrification and Building Electrification? These energy strategies have potential impacts to both electric and natural gas transmission and distribution facilities. Such impacts should be identified and evaluated as part of the Plan.
- How will Ferndale embrace new clean energy technology—such as battery energy storage systems—and protect existing energy facilities with planning policies, codes, and ordinances?
- How will all potential impacts be integrated into the Comprehensive Plan, specifically within the Utilities Element, Subarea Plans, and other elements identified in RCW 36.70A?

On behalf of Puget Sound Energy, thank you for the opportunity to provide comments on the Update. If there is any additional information that I can provide, please contact me.

Sincerely,

Jacquelyn Styrna

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