



August 5, 2024

Joyce Phillips, Principal Planner
City of Olympia Community Planning & Development
601 4th Avenue East
P.O. Box 1967
Olympia WA 98507-1967

RE: Olympia Comprehensive Plan- Utilities Chapter

Dear Ms. Phillips:

Puget Sound Energy (PSE) would like to offer the following comments for consideration in the upcoming amendment of the Utilities chapter of the 2045 Olympia Comprehensive Plan.

Values

We concur with the City's assessment that the community values cost-effective locally provided service delivery that is provided through its city-owned utilities, but we would like to add a focus on private utilities as well. As a utility, we are also focused on providing cost-effective and environmentally conscientious services to the citizens and businesses of Olympia. We are working on initiatives to comply with requirements established in the state's Clean Energy Transformation Act, Climate Commitment Act and the Growth Management Act.

Page 1 (vision for the future). PSE encourages the City to mention the importance of collaborating with utilities here, as well as in subsequent bullet points. Historically, working with utilities is sometimes considered at the later phases of development such as a request for service or even the siting of infrastructure.

Private Utilities- Electricity and Natural Gas (Page 37). It is important to note that PSE has both existing and planned facilities that occur or will occur within the boundaries of the map. This includes both electric and natural gas systems and services located on private and public properties. As has been applied in the past when constructing facilities, PSE will comply with the City's regulations as part of its permitting processes.

Policies

PU1.5 (page 6). PSE is a regulated utility that works within the guidelines and requirements of the WUTC as well as City codes and permitting standards.

PU2.10 (page 7). PSE fully supports the City's efforts and vision to "Consider the social, economic and environmental impacts of utility repairs, replacements, and upgrades while balancing the fair distribution of services and benefits to the entire community".

PU10.7 (page 19). PSE supports the City's efforts to encourage low impact development and green infrastructure. It is important to coordinate such improvements especially within rights-of-way/franchise area where PSE may have existing infrastructure. We are an active participant in the implementation of the state's Clean Buildings Act through the Green Building Accelerator program.

Page 23 (Electricity). PSE is listed as the "only" provider of electricity. It may be more accurate to list PSE as the only 'privately operated' provider of electricity. Renewable energy such as solar is an option for citizens and businesses.

GU16 (page 24). Potentially state: "Private utilities are located underground *whenever possible* to protect public health, safety and welfare." Undergrounding does not always mean better reliability. There are hurdles associated with undergrounding that can disrupt service and make repairs more difficult and less timely.

PU17.2 (page 25). What is meant by "timely" notice? Will the City consider stating a notification timeline goal, such as 90 days prior to work beginning?

GU18 (page 25). We are interested in knowing how or if this policy affects PSE's ability to maintain, operate or site its electric and natural gas facilities and services.

PU18.1 (page 25). How is "reasonable" defined in regards to compatibility with surrounding zoning? We wonder how this may affect both existing and future development of PSE's facilities and services to address growth as well as ongoing energy transformation measures such as Distributed Energy Resources (DERs) and Battery Energy Storage Systems (BESS). It is important to note that similar to electric vehicle charging facilities, not all battery storage systems are identical. Consequently, one size does not 'fit all' when it comes to siting and permitting. Will the City be amending its code to address the siting of such facilities (e.g., BESS)?

Page 36 (Electricity and Natural Gas section)- Unlike some other private utilities, providers of electricity such as Puget Sound Energy (PSE) are required to provide electricity upon demand and in accordance with the Revised Code of Washington; Washington Administrative Code; and the "tariffs" on file with the Washington Utilities and Trade Commission (WUTC). To comply with its public service obligations, PSE must plan to extend or add to its electric facilities when needed.

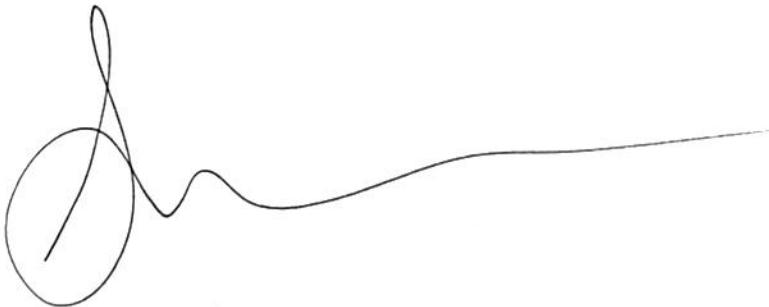
PSE owns, operates, and maintains all electric transmission and distribution substations, as well as the electrical transmission and distribution lines within the City of Olympia.

This obligation does not apply to the delivery of natural gas, as it is considered an alternative fuel, rather than a necessity, as electricity is. In accordance with the laws and tariffs, PSE's natural gas service is a demand-driven utility. PSE installs natural gas services for those customers requesting service for new construction, as well as when customers convert from propane or oil to natural gas. PSE owns and operates all natural gas transmission and distribution mains, including gate stations within the City of Olympia.

The map of Puget Sound Energy's facilities is representative of existing and proposed major PSE electric and natural gas facilities, but does not show distribution lines and ancillary equipment associated with services.

Thank you again for the opportunity to participate in the periodic update to the Comprehensive Plan. Please do not hesitate to contact me on any PSE related issues; I can be reached at sara.wattenberg@pse.com or (253) 306-2255.

Respectfully,

A handwritten signature in black ink, consisting of a large, stylized initial 'S' followed by a long, horizontal, wavy line that tapers to the right.

Sara Wattenberg
Municipal Liaison Manager

Cc: Susan Clark, Drinking Water Director
Ron Jones, Waste ReSources
Amy Tousley, PSE