

- 1 2. On September 12, 2006, Energy Northwest submitted an application for site
2 certification to the Washington State Energy Facility Site Evaluation
3 Council (EFSEC) to construct and operate the Pacific Mountain Energy
4 Center.

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6 **II. STATEMENT OF GENERAL AND PRELIMINARY ISSUES**

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8 Pursuant to EFSEC Notice of Intent to Hold Adjudicative Proceeding, CTED
9 identifies the following general and preliminary issues:

- 10 1. CTED wishes to participate in this proceeding to ensure that EFSEC has access to
11 all the information necessary to make a sound permitting decision that furthers the
12 State's energy policies encouraging energy efficiency, use of renewable and
13 indigenous energy resources, and protection of environmental quality through
14 mitigation of green-house gas emissions. CTED is concerned about the poor
15 quality and quantity of data and information provided by the applicant for the
16 application, draft environmental impact statement, and carbon sequestration plan.
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18 2. As the state agency responsible for implementing the State's energy policy, CTED
19 is concerned about the following issues:
20 a. Will the project improve, or at least maintain, state and regional
21 transmission system reliability?
22 b. Will the project further the goals of using renewable energy and indigenous
23 fuel whenever possible? For example, should PMEC be required to use
24 petroleum coke from Washington refineries instead of coal whenever it is
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1 available? Would this result in higher efficiencies, reduced mercury and ash
2 pollution, and potentially even reduced green-house gas emissions?
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4 3. As Co-Chair of the State's Climate Change Initiatives, CTED is interested in
5 ensuring that the PMEC project development is consistent with the green-house gas
6 reductions, jobs, and energy goals established in Executive Order 07-02. To do so,
7 the following kinds of issues should be addressed:

- 8 a. Estimates used by the applicant for development of green-house gas
9 mitigation and sequestration need to be accurate and achievable;
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11 b. Actual emissions should be accurately monitored over time;
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13 c. Mitigation and sequestration plans and actions need to be appropriate and
14 consistent with the mandates of Chapter 80.70 RCW and ESSB 6001
15 (chapter 307, Laws of 2007);
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17 d. Site certification conditions should further the goal of reduced in-state
18 green-house gas emissions; and
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20 e. Major secondary impacts on green-house gas emissions, such as coal unit
21 train diesel fuel emissions, should be reasonably considered.

22 DATED this 12th day of September, 2007.

23 Respectfully Submitted,

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25 Tony Usibelli, Director
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Energy Division
Department of Community, Trade and Economic Development
PO Box 43173
Olympia, WA 98504-3173
(360) 725-3110 Ph
(360) 586-0049 Fax
tonyu@cted.wa.gov