

Washington Physicians for Social Responsibility (Claire Richards)

This comment is in response to the Washington Department of Ecology's support for a new "natural" gas power plant on the shuttered coal plant in Centralia by the Alberta-based TransAlta corporation.

Due to the continued burning of fossil fuels, we expect that 2026 will be one of the four warmest years on record, and with a very strong El Niño compounded by climate change. We can also expect that 2027 will surpass 2026. These increasing global temperatures are having significant global and local impacts, with increased heat waves, wildfire conditions, droughts, and flooding, resulting in increased large-scale power outages, all of which are associated with physical and mental health impacts [1, 2]. Currently, the Pacific Northwest has about 95 large uncontained fires. This underscores the importance of urgently addressing greenhouse gas emissions, without backtracking on commitments made in the Clean Energy Transformation Act (CETA) to the environment and current and future generations.

The SEPA checklist repeatedly argues that the project is needed because the region faces capacity deficits and reliability risks. It frames the choice as either continuing coal operations or building a new gas turbine elsewhere. It does not rigorously evaluate other plausible alternatives such as improving energy efficiency, long-duration energy storage, transmission upgrades, distributed energy resources and renewable energy. The argument is a false dilemma, implying that gas conversion is the only practical response to reliability concerns when other combinations of resources can also address those concerns, without the significant downsides of extending our reliance on fossil fuels. Similar concerns were raised by Commissioner Clements in her dissent regarding the expansion of the GTN XPress pipeline, where she criticized regulators for narrowly defining project needs and failing to adequately evaluate alternatives [3].

There are several misrepresented claims in the SEPA:

- 1) Use of an outdated and worse available comparator. TransAlta makes comparisons between the CTG project vs. historical coal plant emissions despite the fact that the coal plant is already closed. It could instead compare the "natural" gas project to no project or renewable energy alternative.
- 2) Lack of clear legal basis for using coal as a baseline. The SEPA checklist should clarify the legal basis for using historical avoided emissions to reduce the significance of emissions from the proposed coal-to-gas project. The SEPA checklist states "This early cessation must be taken into account" (emphasis added). Recognition of prior climate benefits and evaluation of future project impacts seem to be distinct regulatory questions.
- 3) Emphasis on percentage reductions rather than total emissions. The document emphasizes percentage reductions relative to coal while downplaying the magnitude of absolute emissions, estimated at approximately 42.8 million metric tons of CO₂e over the project's lifetime. This is similar to extending the coal fired plant for an additional 11.1 years or driving nearly 10 million gas powered cars for 1 year [4].
- 4) There is little evidence for the claim that 59% capacity factor is necessary for Puget Sound Energy (PSE). PSE has included costs for purchasing power from the new gas plant in its current

general rate case, in which the company seeks to increase electric rates for customers by nearly 30% over the next three years; this plan has not yet been approved by regulators. The public has expressed opposition to PSE's rate increases already, this frustration largely contributing to a recent decision by the Kitsap Public Utility District (PUD) to place an initiative to acquire PSE infrastructure on the ballot. It is important to note that high energy costs contribute to energy insecurity and power disconnections due to inability to pay, and cause health impacts related to extreme home temperatures, mold and humidity, and can exacerbate asthma symptoms, while contributing to economic hardship and chronic stress [5].

5) Unsupported claims that we need this gas plant to avoid brownouts and blackouts. It is critical to interrogate the argument that the burning of "natural" gas can result in increased reliability when it contributes directly to climate change, increasing the probability of extreme weather events and large scale power outages, in addition to energy disconnections due to the inability to pay. Research has shown that wind and precipitation are both associated with increased frequency and duration of power outages in Washington State, while atmospheric rivers (which involve both) are also expected to increase in severity with climate change [1]. Further, in December of 2025, Washington experienced historic flooding, resulting in loss of power for nearly 200,000 electric meters and hundreds of millions of dollars in damage to Washington State's infrastructure [6]. Wildfires in eastern Washington have damaged electrical infrastructure, resulting in prolonged power outages, with the potential to increase the cost of electricity. Furthermore, due to concerns about liability, electric utilities in Washington have implemented measures such as proactive de-energizations (also known as Public Safety Power Shutoffs [PSPS]) and operational adjustments to reduce ignition risks; however, such actions can result in longer and/or more frequent power outages, without notice [7]. These situations create complex hazard scenarios that pose risks to public health and safety through cascading impacts on critical services, essential needs, and indoor environmental conditions, with disproportionate burdens on low-income and disadvantaged communities [7]. Important alternatives such as transmission upgrades and battery energy storage systems (BESS) can help avoid brownouts and blackouts and should be incorporated into an overall plan for reliability, not fossil fuels.

6) Incomplete health analysis. The SEPA checklist claims reduced air pollution from converting from coal to "natural" gas, despite the fact that there is no longer a coal plant there. The permit filings argue that converting from coal to natural gas will substantially reduce emissions of sulfur dioxide, nitrogen oxide, particulate matter, carbon monoxide and lead compared with historical coal operations. These comparisons should instead be made to alternatives such as no project or renewable energy. Air pollution affects almost every organ of the body, leading to serious lung diseases like asthma, COPD, and lung cancer, and can worsen cardiovascular disease, causing both heart attacks and brain attacks. It causes infertility, preterm labor and low birthweight, as well as accelerated cognitive decline, dementia and Alzheimer's disease [8-11]. Moreover, the SEPA checklist states that the project is not located in an Ecology-designated overburdened community. However, the location of the project does not identify the communities that will ultimately experience exposure to project emissions. It is not clear if any air dispersion modeling was conducted to determine which populations, including overburdened communities, would experience incremental exposure to air pollution. While it compares the total greenhouse gas emissions between coal and "natural" gas across the lifecycle, the checklist does not consider upstream health impacts. It is missing the many health impacts from the gas supply chain associated with natural gas drilling and hydraulic fracturing, compressor stations, gas processing facilities, and pipeline leaks and venting, and explosions [8-12].

The motives of TransAlta in converting the coal plant to gas is not to support reliability or public health, but to make a profit and have a foothold in expanding gas-fired generation in Washington State. While the filing claims that they are only expanding Unit 2, in a recent investor call, the President and CEO of TransAlta, Joel Hunter states that they are involved in discussions about potentially expanding beyond Unit 2 and looking at future opportunities involving Unit 1 over the next decade [12]. Further, in the same call, TransAlta management stated that AI data center growth is a major strategic priority for their "underutilized assets". If AI growth is a key driver of the need for the TransAlta facility, then this is a serious problem. AI data centers are fast becoming the newest front in the fossil fuel industry's long history of deception about climate change and the necessity of continued fossil fuel dependence [13].

The project's need analysis relies heavily on projections of future electricity demand and resource adequacy as stated by the gas company, yet the SEPA checklist does not appear to evaluate whether projected AI and data-center growth contributes to those forecasts. AI data centers themselves have significant environmental and public health impacts, in no small part due to the use of fossil fuels, and these data centers should be powered by renewable energy [8]. Because electricity production is itself a major water user for data centers, cumulative water impacts associated with serving large new loads should be evaluated alongside generation and reliability claims.

The impacts of a gas power plant and AI data centers should be considered holistically rather than in a piecemeal fashion. Assessing the power plant in isolation risks understating cumulative impacts, including greenhouse gas emissions, air pollution, water consumption, energy costs, transmission needs, and environmental justice concerns. A comprehensive review should consider the full system of generation, transmission, and end-use demand that the project is intended to support.

We ask that this permit be denied.

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