

**Comments by Richard Lauckhart dated October 9, 2018 in Docket No. UE-180607.**

These comments deal with PSE's proposed Energize Eastside project.

On August 4, 2018 I provided comments in this Docket pointing out that the WUTC Acknowledgement Letter in the previous IRP listed deficiencies that need to be corrected in the future. I further indicated that those deficiencies should be address in this 2019 IRP.

I note that the PSE Workplan for the 2019 IRP does not address dealing with these deficiencies noted by the WUTC. Even more problematic is the fact that PSE continues to refuse to provide requested information on their studies showing the need for Energize Eastside. See attached September 19, 2018 latter from PSE to Don Marsh with regards to his request for information.

There is another solution to PSE's intransigence. That solution involves ColumbiaGrid.

In 2015 CENSE and others filed a complaint with FERC asking them to require ColumbiaGrid to conduct load flow studies on the need for Energize Eastside in an Open and Transparent fashion with Stakeholder input. In their Order dismissing the CENSE complaint FERC stated simply that there was no evidence that PSE nor any eligible party had requested in writing that Energize Eastside be a part of a Regional Plan and thus FERC did not have jurisdiction. A very technical point on FERC's part that ignored the history, the 1,500 MW to Canada and the MOU between PSE, Seattle City Light, and BPA.

PSE clearly should have made a written request to ColumbiaGrid to have Energize Eastside be a part of a Regional Plan. It seems clear that Macquarie/PSE chose not to request Energize Eastside be a part of a regional plan because to be included in a Regional Plan ColumbiaGrid would have been required to study the need for the line in an open and transparent fashion with stakeholder input. ColumbiaGrid did not do that. Further, FERC would have determined how much each entity (PSE and SCL and BPA) would be required to pay for the line. *[PSE/Macquarie have signed an MOU with Seattle City light and BPA that requires negligible financial contribution by BPA to the cost of the Energize Eastside even though it is BPAs request that Energize Eastside enhance their ability to move power over their lines to Blaine Washington that is the biggest cause for the need for the line.]* Macquarie wanted none of that to happen because Macquarie wanted to spend the money itself and have it included in PSE's ratebase by the WUTC.

There is another clear way for the WUTC to remedy these problems. FERC has pointed out that neither PSE nor any other eligible party has requested that Energize Eastside be a part of a Regional Plan. But the WUTC is clearly an eligible party to make such a request. The ColumbiaGrid protocol with the WUTC is one document that makes it clear that the WUTC would be an eligible party to make such a request. The WUTC should make that request. By having ColumbiaGrid study the need for Energize Easstside in an Open and Transparent fashion with Stakeholder input, it will assure that the 2019 IRP is properly evaluating the need for Energize Eastside. It will also be a way for the WUTC to assure that if Energize Eastside ever gets built that BPA will pay its appropriate share of the cost of Energize Eastside and that burden will not inappropriately fall on PSE customers.



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September 19, 2018

**Via Express Mail**

Don Marsh  
4411 137<sup>th</sup> Ave. SE  
Bellevue, WA 98006

**Re: CEII Requests dated June 9, 2018 and July 8, 2018**

Dear Mr. Marsh:

This letter is in response to the subject CEII requests. Please accept our apologies for our delayed response.

CEII Request dated June 9, 2018

In this request, you asked PSE to provide the maximum summer and winter peak load levels served by each 230/115 kV substation and each 115/12kV substation serving PSE's Eastside territory for each of the past ten years (2008 through and including 2017). You also asked to include the date and approximate time of each peak load event.

This request is very similar to the request you made in March 6, 2016 for individual Eastside substation load data for a six-year time period. In PSE's response to you dated May 13, 2016, we stated, "Historical loading on individual substations is confidential in order to protect customer sensitive information so this request is denied." Unfortunately, the passage of time has not altered PSE's position that such information compromises the confidential nature of customer sensitive information, so this request is again denied.

In the statement of need in your June 9, 2018 request, you noted, "This information is critical for me to understand the overall need and the specific locational and seasonal need that justifies construction of the Energize Eastside transmission upgrade project." As you may recall, the need for the Energize Eastside project has been documented numerous times: two reports by PSE and national experts from Quanta Technology, and verified by qualified and independent consultants. These experts include Utility System Efficiencies, Inc., a consultant hired by the City of Bellevue at your request.

Additionally, the Federal Energy Regulatory Commission (FERC) dismissed both of CENSE's protest and complaint against PSE, Seattle City Light, the Bonneville Power Administration (BPA) and ColumbiaGrid pertaining to the Energize Eastside Project. Specifically, FERC affirmed that PSE, BPA and ColumbiaGrid complied with their transmission planning responsibilities in proposing and evaluating the Energize Eastside Project as follows:

“Based on the record before us, we find that Puget Sound (PSE) and the other Respondents complied with their transmission planning responsibilities under Order 890 in proposing and evaluating the Energize Eastside Project” (pg. 25, para 63 of the FERC Order Dismissing Compliant under EL15-74)

Lastly, in the statement of need in your June 9, 2018 request, you noted, “I received CEII from FERC on April 8, 2016.” Your March 6, 2016 request contained a similar statement. In PSE's response to you dated May 13, 2016, we stated, “Please note that FERC approval does not constitute PSE approval. FERC jurisdictional entities such as PSE have their own CEII processes and procedures that are meant to function and be applied for separately and independently from those of FERC.” That distinction still exists.

CEII Request dated July 8, 2018

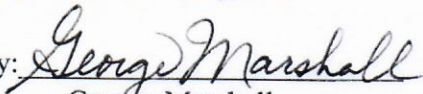
In this request, you asked PSE to provide, for the years 2008 – 2017, a brief description of the date and the situation where Corrective Action Plans (CAPs) were engaged to prevent overloading of the Talbot or Sammamish transformers, and to also note the duration.

While PSE has CAPs in place today, you requested a list of when all CAPs were engaged to prevent transformer overloads at the Talbot (Hill) or Sammamish substations between 2008 and 2017. Prior to April 1, 2014, CAP events were not specifically tracked or reported, so PSE is unable to provide specific data. From 2014-2017, PSE has not had to implement CAPs for the specific contingencies you requested.

Thank you again for your interest in the Energize Eastside project.

Sincerely,

**Puget Sound Energy, Inc.**

By:   
George Marshall

Its: Manager Transmission Policy and Contracts