

October 23, 2018

Executive Director and Secretary  
Washington Utilities and Transportation Commission  
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P.O. Box 47250  
Olympia, WA 98504-7250 submitted by email to records@utc.wa.gov and  
Utility@ATG.WA.GOV

To: Washington Utilities and Transportation Commission,  
Docket U-180680

State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

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Subject: Comments on Proposed Sale of Puget Sound Energy (PSE)

I am a citizen of Bellevue, Washington, Electrical Engineer and PSE ratepayer. I have worked with PSE for many years in the slow process of improving the Reliability in our Bridle Trails Neighborhood of 9000 plus residents. I currently serve as a Technical Advisory Group Member for the 2019 Integrated Resource Plan (IRP).

I am asking the commission to do a thorough review to establish conditions of sale to improve the customer experience for ratepayers. This sale proposes to conduct "Business As Usual" and "Cause No Harm". "Business As Usual" could mean continuing old practices and could cause harm by not embracing improvements in a timely manner. Following are Conditions of Sale for your consideration:

1/ **National Security:** The Commission should require that the transaction be reviewed by the Committee on Foreign investment in the U.S (Cfius). PSE possesses important technology and infrastructure investments that could not be guarded by foreign owners to US standards. This certainly would be to the detriment of ratepayers.

2/ **Customer Satisfaction Goals:** J.D. Power Associates rates electrical power customer satisfaction ratings with peers yearly. PSE's latest rating is 671 points

out of a possible 1000. This shows that there is much room for improvement. As a condition of the sale there needs to be a do better process in working with ratepayers. See <https://www.jdpower.com/business/press-releases/jd-power-2016-electric-utility-residential-customer-satisfaction-study>

**3/ Transparency of Electrical Power Needs:** To protect ratepayers this is essential when reviewing projects. Current projects such as Energize Eastside and 148th Ave NE Transmission Lines do not have this benefit of fairness review by sharing data. This has occurred even though appropriate security clearances have been obtained.

**4/ Charity Equity:** Because of Foreign Ownership there is a tendency to not provide contributions to local causes on a par with other US corporations of similar size, especially local large businesses.

**5/ Need to Update Antiquated State Regulations:** As a condition to the sale establish a Good Neighbor Policy. This involves working with the UTC, legislature and stakeholders to update outdated laws that constrain and essentially block needed improvement, such as competitive bidding etc.

**6/ Permitting Process:** Most local governments do not have full technological expertise to evaluate complex projects such as a transmission line. As a condition of sale, the Commission should require these projects to be reviewed by the Energy Facility Site Evaluation council (EFSEC).

**7/ Board:** Names of Board members should be shared with the public. Currently this does not seem to be the case.

Respectively,

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