

## Comments made by Richard Lauckhart at PSE's October 5, 2017 IRP Advisory Committee meeting

My name is Richard Lauckhart. I have worked in the electric power industry for 40+ years. For 22 of those years I worked for Puget, most notably 5 years as Vice President of Power Planning. Since leaving Puget, I spent the rest of my career as a consultant in the electric power industry.

Over the past two years, I have spent considerable time and energy investigating PSE's proposed Energize Eastside project. I have investigated this project on a deeply technical level, for no compensation whatsoever, because I am compelled by my conscience.

Based on my thorough investigation, I must conclude that the Energize Eastside project is not needed. I have placed 16 documents on the record in this PSE IRP Docket No. UE-160918 that lead me to this conclusion. On the table, I provided a listing of those 16 documents that includes the date when the document was filed with the WUTC and a brief description of what is in each document.

In general these documents demonstrate that the load flow studies and other analyses that PSE used to justify the Energize Eastside project are flawed and they need to be redone to fix these flaws.

I provided on July 25, 2017 the Lauckhart-Schiffman load flow study that has fixed these flaws. The Lauckhart-Schiffman load flow study demonstrates that if these flaws are fixed, then Energize Eastside is not needed now or any time soon.

I also provided via an email filed on August 14, 2017 a document that lists alternatives to Energize Eastside that would be better if at some point in time there is a need to address a reliability problem on the eastside. These include more DSM, batteries, 230/115 transformer at Lake Tradition, Seattle City Light line option, etc.

The September 12, 2017 document I provided for the record includes seven questions under item number 2 that I believe are crucial to understand the need for this project. Yesterday, PSE responded with what they called "high-level responses" that did not answer the seven questions. I believe PSE needs to answer these questions.

PSE claims that Canadian transfers and generation dispatch have no relevance to the need for Energize Eastside. To prove that they are irrelevant, PSE should rerun the load flow studies without inter-regional flows and with local generation operating. The Lauckhart-Schiffman load flow study found there is no transformer capacity issue or other reliability problem, when these inputs are correct.

**Unless PSE reruns its load flow models and makes them available for inspection for people like myself that have CEII clearance from FERC, the only correct load flow model on the record regarding the need for Energize Eastside is the Lauckhart-Schiffman load flow study. The Lauckhart-Schiffman study is the only one that uses the load forecast PSE gave to the Western Electricity Coordinating Council, correct inter-regional flows, and appropriate generation dispatch. That study concludes that Energize Eastside is not needed now or any time soon.**