

**From:** [Curt Allred](#)  
**To:** [UTC DL Records Center](#)  
**Cc:** [Curt Allred](#)  
**Subject:** Comments on PSE IRP - Dockets UE-160918 and UG-160919  
**Date:** Thursday, February 22, 2018 7:07:37 PM

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Date: 22 February 2018

To: the Washington Utilities and Transportation Commission  
From: Curtis Allred - 13609 SE 43rd Pl, Bellevue, WA 98006

Subject: Dockets UE-160918 and UG-160919, PSE's Integrated Resource Plan, pages 8-30 to 8-53

Dear Commissioners,

My comments are specifically about PSE's Energize Eastside project, a proposal to build a 230 kV transmission line through the heart of Eastside neighborhoods in the cities of Redmond, Newcastle, Bellevue, and Redmond.

The project is environmentally destructive. It worsens an already unsafe co-location of a transmission line and a petroleum pipeline. It's expensive, costing ratepayers approximately a billion dollars, possibly more, over its lifetime. And to make matters worse, it becoming more and more obvious that it's not needed.

PSE is an opaque private entity, operating in a regulatory environment designed for public utilities. Public utilities are open and transparent, sharing information and data with the public who they serve. PSE, on the other hand, hides the data they use to justify their projects. PSE is closely guarding the data they used to justify Energize Eastside. All we know is that they used an extreme case in the coldest winter with 5 power plants being offline while the system transmits 1.5 megawatts to Canada.

PSE points to independent studies that justify the project. These studies were performed by Quanta Technology, who appears to be more of a business partner than an independent entity. Quanta Technology is the consulting arm of Quanta Services, who PSE also contracts for field work. This is potentially a conflict of interest that should be investigated.

There was an attempt by 2 truly independent industry experts to study the need for Energize Eastside. FERC clearance was obtained in order to request the data necessary to perform the study, but PSE refused to give them the data. The UTC is aware of and has stated a concern about this issue and I would like to see further pressure on PSE to release the data. Alternative load data was obtained through other means and a load flow simulation was performed. This simulation demonstrated that Energize Eastside is not needed (Ref 2).

I realize the UTC has no authority to intervene in this project, but I request that the UTC formally notify PSE that no rate case will be approved for Energize Eastside until the need is validated by a truly independent analysis, and alternatives such as batteries are considered, using updated cost and technology parameters.

I have recently become aware that PSE's power rates the highest in Washington. Do we know why? Perhaps it's all the unnecessary infrastructure they build in pursuit of the guaranteed 10% return on investment paid by us, their customers. Perhaps it's all the money they spend on marketing campaigns to instill fear in the community and to market these unneeded projects to

the public. PSE has lost credibility in the community and must be put on notice.

Thank you for listening, and for accommodating the large outpouring of public comment on PSE's IRP at the February 21st hearing.

Please deny any rate increase associated with Energize Eastside!

Sincerely,  
Curtis Allred  
13609 SE 43rd Pl, Bellevue, WA 98006

Reference 1: Lauckhart-Schiffman Load Flow Study. Available at:  
<http://cense.org/Lauckhart-Schiffman%20Load%20Flow%20Study.pdf>