

**From:** [Jeanne DeMund](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** Docket # UE-160918 and UG-160919  
**Date:** Wednesday, February 21, 2018 8:32:28 AM

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Dear WUTC Commissioners;

I am writing to express my concerns about Puget Sound Energy's 2017 Integrated Resource Plan, as represented by the docket numbers above.

Although transmission planning is supposed to be addressed in the IRP, I feel that PSE has not done an adequate evaluation of alternatives to the Energize Eastside transmission line project. Nor has PSE been appropriately responsive to citizen interest in exploring alternatives, and has not been cooperative in providing the data necessary for citizens to conduct a thorough evaluation in spite of numerous and exhaustive requests for data. Most importantly, PSE has not been forthcoming with information to allow citizens to evaluate the underlying actual need (if any) for the Energize Eastside project.

We can see that growth in demand for electricity locally, regionally and nationally is not growing as fast as it has historically, due to conservation, energy efficiency technology, building codes, etc. PSE originally predicted over 2% annual growth in their needs analysis for Energize Eastside. That chart is no longer featured on their website, and any figures citizens are able to access suggest that the actual growth is far less, or even flat, calling into question the underlying need for the Energize Eastside project.

We can also see that prices for battery storage options are falling drastically and rapidly. Your organization, the WUTC, has directed utilities to include storage options in their resource planning activities. I feel that PSE has not done an honest, current, and accurate evaluation of the current costs for a storage-based solution for East King County's electricity needs. A phased solution that includes battery storage would significantly lower the cost to ratepayers for resolving any electricity needs, and allow that cost to be spread over time.

Unfortunately, the cities where PSE is filing or has filed Land Use Permit applications do not have the technical expertise to evaluate need. EFSEC has that expertise, and I find it significant that PSE has chosen not to apply to EFSEC for a permit, but rather to apply to 4 cities, and endure an exhaustive and expensive public process. Washington State's antiquated guaranteed return on investment system has incentivized that approach. PSE knows that they can roll all these costs into the project and make 10% profit. As an investor owned, not public, utility, I find this a powerful incentive for PSE to push forward with an expensive project that no longer makes sense from a need or least-cost perspective.

I recognize that the WUTC does not have the ability to evaluate the Energize Eastside project, nor is it a permitting agency. However, the WUTC can signal through their response to the 2017 IRP where they believe PSE has fallen short with regards to this project, and can implement changes to the IRP process to require improvement in future planning exercises.

Lastly, I am concerned about PSE's activities in commencing building the Tacoma LNG plant in the absence of complete permitting.

Overall, I believe that PSE has demonstrated a clear disregard for citizen concerns in both the Energize Eastside project and the Tacoma LNG project, and has sought to minimize or eliminate citizens' ability to fully analyze the Energize Eastside project. The citizens look to the WUTC to protect our interests, and I would strongly recommend that the WUTC not approve a rate increase to cover these projects if PSE decides to proceed in the face of the many shortcomings and deficits noted above.

Jeanne DeMund

