

Lin Hagedorn
350 Eastside
15418 210th Ave NE
Woodinville, WA 98077

October 24, 2018

Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

RE: Comments for Docket No. U-180680
PSE Ownership transfer proceeding

Dear Commissioners,

I'm writing to you as someone who was raised in Bellevue, spending my summer days picking blueberries at the "Lake Hills Blueberry Farm" and didn't move away until my third year at the University of Washington. I now live in Woodinville and am the mother of two post-graduate college-age kids who are on the cusp of starting careers and families of their own. My concern for their future was heightened this week by a new report from the Intergovernmental Panel on Climate Change (IPCC). The report says global temperature will increase by another half-degree Celsius during the next decade or two. The consequences for our planet and humanity will be severe. Although the Puget Sound region has avoided the worst of hurricanes, droughts, fires, and floods that have devastated many other areas, there are warning signs nearby:

- Hundreds of thousands of salmon perishing in water that is too warm.
- Native Orcas starving to death in the Salish Sea (Puget Sound bioregion).
- Declining snow packs, which reduce availability of cheap hydro power, putting a drag on our local economy.
- Burning forests that reshape the landscape and choke our vulnerable citizens.
- Low-lying parts of Olympia and Tacoma experiencing more frequent flooding.
- More powerful winter storms that damage our infrastructure and increase power outages.

To avoid the worst of these effects, citizens expect our government and our energy utilities to make heroic efforts to reduce the greenhouse gas emissions that thousands of climate scientists agree are causing these problems.

In am one of a six-member Steering Committee of the local environmental organization known as 350 Eastside. Our 350 Eastside group has been active in opposing PSE proposed transmission project, the Lake Hills Transmission Line, which will do little to improve the reliability of our electric grid and do nothing to address emissions that are causing climate change. PSE is dragging its feet and resisting investments and innovation to mitigate climate change. To illustrate the problem, please refer to the article below that I copied from an online article published by our local newspaper, the Bellevue Reporter.

As you can see, four out of the five advertisements are dedicated to PSE's Energize Eastside project. The message is clear: "Don't worry about conserving electricity. Demand will keep growing, and PSE must burn

Received
Records Management
10/25/18 08:31
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

fossil fuels to meet that demand, even if it harms the environment and future generations.”



Conservation alone will not meet Eastside electricity demand

GET THE FACTS ABOUT ENERGIZE EASTSIDE

MORE



Don Marsh, co-founder of CENSE, speaks to the crowd about the Puget Sound Energy transmission line project. Evan Pappas/Staff Photo

Bellevue residents hold rally to oppose Puget Sound Energy transmission line

Residents gathered at 148th Avenue SE to oppose Puget Sound Energy's transmission line project.

By Evan Pappas
Monday, October 8, 2018 8:30pm | NEWS



Bellevue residents gathered at the intersection of 148th Avenue Southeast and Main Street on Saturday, Sept. 29, to protest Puget Sound Energy's Lake Hills - Phantom Lake transmission line project.

The PSE project would construct new transmission poles along Northeast 8th Street and 148th Avenue Southeast in order to connect the Lake Hills and Phantom Lake substations.

ADVERTISEMENT

The intent of the project, which has been in the works since 2007, is to increase reliability in the event of a power outage by having the substations connected to two transmission lines instead of just one. In order to begin the development of the Lake Hills - Phantom Lake project, trees would need to be removed from the pathway of the transmission lines.

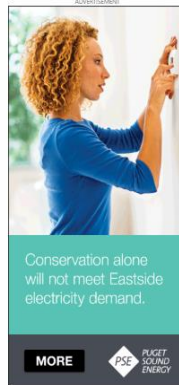
The project's impact on the environment and community has not been well received by several residents and community groups in the East Bellevue area. Saturday's rally saw dozens of residents and community group representatives come together to show their opposition to the project.

Don Marsh, co-founder of the Coalition of Eastside Neighborhoods for Sensible Energy (CENSE), spoke to the crowd at the rally about the project and its impacts on the area. In addition to removing trees and the visual impact of tall power lines, Marsh criticized the use of transmission lines over a less impactful technology, referred to as a self-healing grid.

"The purpose (of the rally) is to show PSE that there is a community interest in a better solution than what they are proposing," Marsh said.

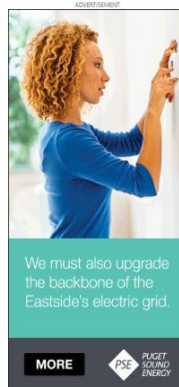
A self-healing grid is a distribution system that will automatically adjust power distribution in an area depending on power outages to make sure power stays up for the most residents possible, while also helping repair crews locate the point of fault in the system quicker. PSE currently has more than 20 self-healing grids installed and planned for installation throughout the region, including in downtown Bellevue.

In addition to CENSE, other community organizations have formed a coalition in opposition to the project — the Puget Sound Chapter of Mothers For Energy Efficient Utilization (MUEU) and the Citizens'



Conservation alone will not meet Eastside electricity demand.

MORE



We must also upgrade the backbone of the Eastside's electric grid.

MORE



We must also upgrade the backbone of the Eastside's electric grid.

MORE



20% Any single

PSE is pursuing these projects like a political campaign, rather than establishing a clear technical need affirmed by experts at a state agency like EFSEC.

What could cause a company to behave this way?

I believe the company's investors play a significant role. None of PSE's investors are located in the Puget Sound region, or even in the United States. To foreign fund managers, PSE is just an investment in a distant country used to achieve maximum returns. If a transmission line delivers more profit than investments in smart technology and deep efficiency, then PSE will build the transmission line.

As a consequence of the UTC's 2009 decision to allow foreign ownership of our utility, significant decisions about our future are made by an opaque, unaccountable, profit-driven investment vehicle for absentee owners.

The best way to remedy this problem would be to return PSE to local control, with greater transparency and accountability. This may not be within the Commission's power to achieve, so we ask the Commission to add terms and conditions to the sale which align the company's behavior with local community and environmental values:

- PSE must become more transparent by sharing project information with independent experts who have the appropriate clearance and have executed Non-Disclosure Agreements.
- PSE must commit to an IRP process that fully and fairly evaluates a plan to deliver carbon-free energy in the next 20 years.
- To deliver an accurate plan, PSE's IRP must use up-to-date data and analysis on the social cost of carbon and the rate of methane leakage.
- PSE should take an active role in University of Washington's new "EarthLab" climate initiative: <https://www.seattletimes.com/seattle-news/former-interior-secretary-sally-jewell-will-guide-uws-new-climate-initiative/>
- PSE must re-evaluate transmission projects to account for lower-than-projected demand for electricity and rapid advances in technologies like batteries, demand response, and distribution automation ("self-healing grid").
- PSE must assist communities' efforts to mitigate climate change by supporting and promoting community solar projects. Battery projects can improve reliability and resilience in an era of increasing storms.

More transparency is necessary, because PSE has refused to share critical data and analysis with well-qualified experts in many cases. For example, PSE refuses to share historical demand data for Eastside substations. Experts could analyze this data to help Eastside customers understand the need for the company's proposed Energize Eastside project. Such data might reveal a less damaging solution to address hot spots of local demand growth.

Similarly, PSE refuses to share IRP modeling data with the Sierra Club, even though many utilities have done this in other states. Sierra Club could verify that PSE is pursuing environmentally sound projects and policies.

PSE refused to share circuit data with a qualified expert hired by East Bellevue customers to study the feasibility of "self-healing grid" technology as a better alternative for East Bellevue than a controversial transmission line project.

PSE refused to share safety data with Tacoma residents who wonder how dangerous an LNG storage facility might be for nearby neighborhoods.

PSE serves a region known for its technological innovation and commitment to environmental sustainability. At a time when even the Northwest is threatened by climate change, the Commission can help by proposing terms and conditions that encourage transparency and sustainable environmental practices.

Sincerely,

350 Eastside Steering Committee

Sara Papanikolaou, Emily Powell, Lynn Ritter, Phil Ritter, Bonnie Shipman and Lin Hagedorn