

**From:** [Records Center \(UTC\)](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** FW: Public Comments RE PSE's 2017 IRP Docket UE-160918  
**Date:** Thursday, February 22, 2018 5:54:54 PM  
**Attachments:** [PSE - IRP Testimony - Feb 2018.docx](#)

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From: whalvrsn1@frontier.com  
Sent: Thursday, February 22, 2018 5:54:50 PM (UTC-08:00) Pacific Time (US & Canada)  
To: Records Center (UTC)  
Subject: Public Comments RE PSE's 2017 IRP Docket UE-160918

To: Washington Utilities and Transportation Commission

Attached please find my testimony concerning PSE's 2017 IRP plans - Docket UE - 160918 and UG - 160919 before the Open Meeting at the Renton Community Center, February 21, 2018. Please add this to my previous testimony dated January 15, 2018.

On February 20th at 5:43 p.m. -- like other advisory board members -- I received PSE's comments concerning this plan and comments to the WUTC staff (Ken Johnson to Mr. Steven King, dated February 20, 2018).

Since PSE's response came two weeks after the WUTC provided comments to PSE and less than a day before your hearing, we find that once again PSE has "cherry picked" their answers to the Energize Eastside project and issues. For months, advisory group members anticipated an analytical discussion of data and facts. This did not happen. PSE's current answers to the staff do not provide any more of the facts or data which the WUTC and ratepayers deserve.

It is all too obvious that (1) PSE does not believe that they need to fully fulfill WAC 480-10-132 or WAC 480-100-238 requirements; (2) PSE does not believe that public involvement, transparency, and analytical dialogue of data and facts is a requirement as a regulated entity; (3) PSE's description of plans is all that is necessary, particularly as it relates to transmission planning and Energize Eastside; (4) PSE does not believe that any prudency tests or requirements are warranted as a planning measure by the WUTC or by ratepayers, even if in fact this maybe beneficial in future rate making hearings.

Therefore, it is my opinion the Commission has no recourse but to reject the 2017 Integrated Resources Plan until such basic weaknesses are addressed.

Again, I thank you and your staff for your work in this matter and look forward to your follow through.

Sincerely,

Warren E. Halverson  
13701 NE 32nd Pl  
Bellevue, Washington 98005

Testimony by Warren Halverson @ WUTC Public Hearing; PSE 2017 Integrated Resources Plans for Electricity and Natural Gas Dockets UE-160918, Feb. 21, 2018

GOOD MORNING, MY NAME IS WARREN HALVERSON. I LIVE AT 13701 NE 32<sup>ND</sup> PLACE, BELLEVUE WASHINGTON AND AM A RATEPAYER IN THE BRIDAL TRAILS NEIGHBORHOOD, PRESIDENT OF OUR HOMEOWNERS ASSOCIATION AND A BOARD MEMBER OF THE COALITION OF EASTSIDE NEIGHBORHOODS FOR SENSIBLE ENERGY. I AM A RETIRED EXECUTIVE OF US WEST AND CONSULTANT IN MARKETING, SALES AND REGULATORY INDUSTRIES.

HAVING ATTENDED NEARLY EVERY IRP MEETING AND SERVING ON THE ADVISORY COUNCIL, I WANT TO THANK YOU AND YOUR STAFF FOR THIS ANALYTIC FORUM; THE MEMBERS OF THE ADVISORY GROUP FOR THEIR ROBUST DEBATE AND PSE FOR SOME DEGREE OF OPENNESS ....

EVEN AT THAT PARTS OF THIS IRP ARE QUESTIONABLE AND INCOMPLETE. IN CHAPTER 5 "ENTITLED DEMAND FORECAST" THERE IS NO DISCUSSION OF GROWTH AREAS AS THERE WAS IN THE 2015 IRP. THIS IS REALLY IMPORTANT BECAUSE IT TELLS YOU WHERE GROWTH IS TAKING PLACE WHICH WILL REQUIRE CAPITAL EXPENDITURES. ALSO, PSE HAS NOT PROVIDED A CURRENT 10 YEAR "EASTSIDE CUSTOMER DEMAND FORECAST", WHICH HAS BEEN THE CORNERSTONE OF PSE'S PUBLIC JUSTIFICATION FOR ENERGIZE EASTSIDE.

P.2. Testimony of W. E. Halverson

YET, RATEPAYERS ARE BEING TOLD THE ENERGIZE EASTSIDE PROJECT MUST BE CONSTRUCTED TODAY -- IN THE 2018/19 TIMEFRAME -- TO AVOID POTENTIAL "ROLLING BLACK OUTS". IT IS ONLY REASONABLE AND PRUDENT THEN THAT THIS ANALYSIS BE INCLUDED, TODAY, IN THE 2017 IRP. WE SIMPLY CAN'T WAIT.

IN CHAPTER 8 "SYSTEM PLANNING" PSE USED ENERGIZE EASTSIDE AS A DESCRIPTIVE EXAMPLE OF TRANSMISSION PLANNING. THIS IS A GOOD START BUT DOES NOT GO FAR ENOUGH. THERE IS NO MODELING OR ANALYSIS. THERE ARE NO CURRENT LOAD FLOW STUDIES WHICH ARE THE CORNERSTONES FOR TRANSMISSION PLANNING. FURTHERMORE, THE IRP ADVISORY COMMITTEE NEVER HAD ANY INPUT, NEVER 'VETTED' NEVER APPROVED. THIS LACK OF OVERSIGHT AND REVIEW IS TOTALLY INADEQUATE IN THE 2017 IRP AND SHOULD NOT BE KICKED DOWN THE ROAD TO THE 2019 IRP.

THE ELECTRICAL INDUSTRY IS RAPIDLY CHANGING: TREMENDOUS CHANGES IN PRODUCTION WITH SOLAR & WIND; CONSERVATION, EASILY SURPASSING WHAT MANY THOUGHT COULD BE ACHIEVED; NEW TECHNOLOGIES, BATTERIES AND DEMAND RESPONSE; SMART GRID DESIGN WITH VARIOUS PROTOCOLS; HOUSES AND HUGE CORPORATE BUILDINGS BECOMING ENERGY SUFFICIENT. THESE ARE SIGNIFICANT!

P. 3. Testimony by W. E. Halverson

SO SIGNIFICANT THAT THE BPA JUST THIS LAST YEAR CANCELLED THE CONSTRUCTION OF A 550KV TRANSMISSION LINE.

AND CAME UP WITH A WIRE TO NON-WIRE SOLUTION USING STORAGE BATTERIES, FLOW CONTROL DEVICES, DEMAND RESPONSE AND DISPATCH AND INJECTION PROTOCOLS. BPA NOTED THAT THIS WOULD SAVE MILLIONS OF DOLLARS IN MITIGATION AND IN ESCALATING PROJECT COSTS (THE LEAST COST, BEST PRACTICES SOLUTION IF YOU WILL.).

IT IS A MORE FLEXIBLE, MORE EFFICIENT AND A MORE SCALABLE SOLUTION FOR BOTH TODAY AND TOMORROW.

IN CONCLUSION, PSE'S 2017 IRP DOES NOT MEET THE INTENT AND REQUIREMENTS IN WAC 480-100- 132 FOR TRANSMISSION AND WAC 480-100-238 FOR INTEGRATED RESOURCES PLANNING. RATHER THAN AN OUTRIGHT REJECTION, YOU MIGHT CONSIDER REQUESTING PSE PROVIDE A SUPPLEMENTAL TO THE CURRENT 2017 IRP REGARDING TRANSMISSION DEMAND AND PLANNING; AND, HOLDING A SEPARATE SPECIAL HEARING RELATED TO ENERGIZE EASTSIDE, THEREBY FULLY MEETING PRUDENCY TESTS AND OVERSIGHT RESPONSIBILITIES OF THE COMMISSION.

MY COMPLETE REMARKS ARE ON FILE.

THANK YOU.