February 21, 2018

Docket: UE-160918 and UG-160919
Public Comment

The WUTC is the only protection that citizens in the Puget Sound region have against PSE's monopoly. As a private citizen and ratepayer I urge the WUTC to evaluate PSE's IRP closely.

PSE's Energize Eastside is a massively over-scaled project. Their preferred plan is based on an incorrect and outdated energy demand forecast assumption. Current energy demand has not increased on the Eastside. A responsible utility should be required instead to invest in renewable resources, energy storage, and other modern solutions to meet energy demand.

PSE's preferred design of the Energize Eastside project is unsafe as per the DNV-GL report.The co-location of two high power electric power lines with two high pressure liquid petroleum (jet fuel) pipelines is not safe. PSE's own analysis of the DNV-GL report is concerning. PSE interprets the report incorrectly. The Energize Eastside project is not safe. The safety issues have not been taken seriously by PSE. The DNV-GL report should be analyzed independently of PSE, and the Energize Eastside project needs a close look by WUTC.

PSE is wasting rate payer dollars with Energize Eastside. The project using obsolete technology will cripple our electric infrastructure and solves nothing. Using modern technology incrementally for energy infrastructure design is the solution to responsibly address future energy need. The safety concerns about construction and usage of high voltage power lines near the petroleum pipelines is not safe. Why are the rate payers being subject to buying into out dated, unsafe project by a privately, foreign owned company if there are cheaper and safer alternatives?

The technical expertise to evaluate PSE's project critically will not happen at the local level. The DEIS for Energize Eastside is biased and inadequate. The final report is to be complete soon. Safety of the citizens, and the future of our energy infrastructure is the duty and responsibility of WUTC. Please do the evaluation and protect the citizens.

Lori Elworth

8605 129th CT SE Newcastle 98056

Criteria for Pipelines Co-Existing with Electric Power Lines – DNV GL October 2015

- Separation distance
  - D < 100 ft
  - High Severity Ranking of HVAC Interference
- HVAC Power Line Current
  - I ≥ 1,000 Amps
  - Very High Severity Ranking of HVAC Interference
- Collocation Length
  - L > 5,000 ft
  - High Severity Ranking of HVAC Interference
- Collocation / Crossing Angle
  - Θ < 30
  - High Severity Ranking of HVAC Interference

- http://www.ingaa.org/File.aspx?id=24732

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- DNV GL enables organizations to advance the safety and sustainability of their business.
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US DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) Hazardous Liquid Pipeline Incidents

- ELECTRICAL ARCING FROM OTHER EQUIPMENT/FACILITY (06/12/2010 - 09/09/2015)
  - $68,772,650
- THIRD PARTY EXCAVATION DAMAGE (01/09/1996 - 12/08/2015)
  - $144,702,203
- UNSPECIFIED CORROSION (10/28/1997 - 11/19/2009)
  - $6,062,845
- MISCELLANEOUS (01/15/1996 - 12/08/2015)
  - $160,891,735
  - (Bellingham disaster classified as miscellaneous)
- Injuries and fatalities (02/27/1996 - 12/23/2015)
  - 23 injuries (8 in 06/10/1999 Bellingham Olympic Pipeline disaster)
  - 29 deaths (3 in 06/10/1999 Bellingham Olympic Pipeline disaster)

Safety Requirements in Planning

- Within the engineering domain, safety engineering transcends all other engineering disciplines in importance
- There is essentially zero margin of error acceptable in safety requirements, design, and implementation
- Key to safety is construction of verifiable requirements
- A well intended requirement is fairly useless if compliance is not verifiable
- Avoid extrapolations, analysis, and other ambiguities when direct inspection is available

Verification via Inspection

- Inspection is one of the most robust, repeatable, and reliable methods of compliance verification
- Many safety related requirements are specified in terms of an inspect-able quantity:
  - Distance between Radio Frequency sources and people or susceptible objects
  - Distance between open conductors and other objects in a power distribution system
  - Distance between heat sources or other ignition sources and flammable materials and substances
- Avoid extrapolations, analysis, and other ambiguities when direct inspection is available

From: **Lori E** ljdemail@comcast.net
Subject: Fwd: Public comment response for docket 160365
Date: February 18, 2018 at 3:30 PM
To: Lori Elworth ljdemail@comcast.net

Begin forwarded message:

From: "Roberts, Andrew (UTC)" <aroberts@utc.wa.gov>
Subject: **Public comment response for docket 160365**
Date: May 23, 2016 at 4:52:34 PM PDT
To: "ljdemail@comcast.net" <ljdemail@comcast.net>

Dear Ms. Elworth,

Thank you for your public comment. I am responding to your concerns about the Energize Eastside project. I apologize for the delay. In order to address your concerns I have had to research the issues.

The primary function of the Utilities and Transportation Commission (the commission) is economic regulation of private, for profit utility companies. The commission has the authority to review proposed rates from utility companies. The commission is required by RCW 80.28.020 to set a rates that are "just, reasonable, or sufficient".

The commission is required when determining a rate to allow the company a fair rate of return. In other words, the commission has to allow the opportunity for a profit. The rate of return is an opportunity, not a guarantee. If the commission were to impose a fine on a company, the fine would come out of the rate of return. A regulated utility cannot increase customer rates to recover the cost of a fine. The same is true if the company operates inefficiently, or spends unwisely. If the company is unable to justify the costs, it would not be able to recover those costs through customer rates.

As an economic regulator, the commission only has the authority to review a project after a company seeks to recover the costs through consumer rates. The project has to be "used and useful" it also has to be prudent. Once a company makes a request to recover the costs of infrastructure investment through rates commission staff, the commissioners, and public council staff from the Attorney's General Office review the company proposal. Then the company, commission staff, and public council each make their case in front of the commissioners. After hearing each side the commissioners make a decision to allow the infrastructure costs in rates, modify, or deny the company proposal.

If the commissioners saw it appropriate to modify or deny recovery of Energize Eastside costs, Puget Sound Energy (PSE) would likely have to take the costs not recoverable through customer rates out of any rate of return the company was able to earn.

In regards to the need for Energize Eastside, PSE states on page 1-12 of the draft EIS that it is attempting comply with transmission reliability requirements set by the North American Electric Reliability Corporation (NERC), a federal regulatory non-profit corporation. NERC regulations set in NERC TPL-001-4 require PSE to place simulated stressors on its system. These stressors include running models simulating a range of possible system failures such as failure of a transformer or a transmission line. If simulations identify deficiencies in the electrical system PSE is then required by NERC to fix them or develop a "corrective action plan" (CAP) to compensate for those deficiencies. It is important to note that a CAP is a temporary fix and can include what NERC refers to as non-consequential load loss. Meaning that some consumers, according to NERC guidelines could be without service.

The question of need is one that should be addressed through the Environmental Impact Statement (EIS), under the authority of local jurisdictions.

The EIS falls under the local jurisdiction. The best place to comment or seek assistance with the EIS is your local municipality. The city of Bellevue would likely be a good contact as well, it is my understanding that Bellevue has taken the lead for the EIS process.

In regards to safety violations the company may have received. You can obtain information the commission has by filing a request for public records. You can file this request at www.utc.wa.gov by clicking on the "Request Records" link at the top of the page, or by calling our records center at (360) 664-1234.

In regards to safety standards, there is not one central location to go for safety standards. Possible sources of information would include American Society of Mechanical Engineers, the American Petroleum Institute, and the National Association of Corrosion Engineers. Ultimately, each local jurisdiction is responsible for setting and enforcing building codes. The National Electric Safety Code generally states that there must be a 10 foot setback between any structures. It is my understanding that some of the local jurisdictions are investigating the setback issue and may impose their own setback requirements using their local authority.

Andrew Roberts
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(360) 664-1101

Utilities and Transportation Commission
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