



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

March 22, 2016

Mr. Richard Lauckhart
4475 Clubhouse Drive
El Macero, CA 95618

Re: New/Revised CEII Information Request

Dear Mr. Lauckhart:

Puget Sound Energy, Inc. (PSE) is in receipt of your email dated February 21, 2016 requesting, among other things, load flow information related to the Energize Eastside Project as part of a new/revised CEII Request.

As a preliminary matter, the release of Critical Energy Infrastructure Information (CEII) requires the utmost due diligence by PSE. Irrespective of your letter from FERC, PSE's FERC Order 890 CEII Requests Procedures require PSE to evaluate the requester's identity (background checks), and qualifications (e.g., software access, software licenses, statement of qualifications to perform power system engineering and transmission planning). WECC base case data is subject to the WECC Information Sharing Policy which requires the requester to hold membership in or to execute a non-disclosure agreement with WECC. As stated previously and consistent with PSE's OATT, a CEII Request Form needs to be completed and submitted to PSE. An individual requesting CEII must identify the information requested with specificity and describe with particularity how that information will be used.

In addition, a requester must also provide sufficient details and clarity that demonstrates a legitimate need for the information requested and supports the requester's qualifications. Another set of copies of PSE's CEII Request Form and of PSE's Order No. 890 CEII Request Procedure are enclosed for your convenience. When filling out the CEII Request Form, please include, *at a minimum*, the following supplemental information:

- A statement of your qualifications to perform power system engineering and transmission planning.
- A description of the computer(s) and software that you will be using to access the CEII, including but not limited to:
 - Who has the licenses to the software;
 - Who owns and has access to the computers that you will be using to access the data; and
 - How you will secure the data.

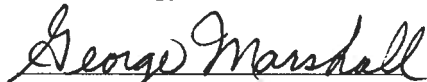
In assessing your qualifications, we will consider, among other things, the February 18, 2016 Load Flow Modeling study you authored and your recent public comments about your study. If there is anything you would like to clarify about the study or your comments in your application that can provide insight as to your qualifications, please do so.

It is unclear whether you are requesting the release of CEII individually, or on behalf of yourself and others. Your request indicates that previous load flow data has been run *with a colleague*. Your request also states “But we need these files from the PSE load flow runs in order to perform a proper comparison.” Moreover, it is unclear if and/or how your colleague or other individuals with whom you may be working have acquired access to this FERC Form 715 base case data. PSE treats CEII and confidentiality matters seriously and CEII information is intended for the specific individual and shall not be disclosed to clients, co-workers, or anyone other than a person granted access to any CEII materials such as FERC Form 715 data. If other individuals want to access the CEII data, they will need to apply for CEII access separately.

Finally, all of PSE’s publicly available documents related to the Energize Eastside Project can be found at PSE’s Energize Eastside website PSE.com/energizeeastside, and the details of the need, which you seem to be focusing on, are laid out in the Needs Assessment (PSE.com/energizeeastside.com/documents). The need for the Energize Project has been documented five times. Multiple experts in power system engineering and transmission planning have reviewed studies and confirmed the need for this project. Five total studies have been completed, three of which were publicly funded. One of Bellevue’s contractors was one of those five and not only reviewed PSE’s studies but also performed studies of their own which showed there was a clear need for the Project.

Sincerely,

Puget Sound Energy, Inc.

By: 
George Marshall

Its: Manager, Transmission Policy & Contracts

Enclosures

Order No. 890 CEII Request Procedure

Pursuant to Order No. 890¹ of the Federal Energy Regulatory Commission (“Commission”), a Transmission Provider may restrict disclosure of Critical Energy Infrastructure Information (“CEII”) required to be disclosed by Order No. 890.

Except as otherwise set forth in section 4 of the Open Access Transmission Tariff of Puget Sound Energy, Inc. (“PSE”) or in its Open Access Same-Time Information System, a requester may request CEII required to be disclosed by Order No. 890 from PSE using the procedures set forth below. As used in these procedures, CEII has the meaning given to such term by the Commission in 18 C.F.R 388.113, as such term may be amended from time to time.

(i) A requester shall file a signed, written request in the form attached with PSE at the following address:

Puget Sound Energy, Inc.
355 110th Avenue NE, EST-06E
P.O. Box 97034 EST-06E
Bellevue WA 98009-9734
Attn: Manager, Transmission Contracts--CEII Request

(ii) Requests for CEII will be considered to be received upon actual receipt by PSE.

(iii) PSE will make a determination of whether it considers the requested information to be CEII and whether to comply with the request or deny the request in whole or in part.

(iv) PSE will endeavor to notify the requester within twenty (20) working days after PSE’s receipt of the request for CEII of its determination.

(v) If PSE determines that the requester is eligible to and should receive the requested CEII, PSE will determine what conditions, if any, to place on release of the CEII and may forward a form of CEII Non-Disclosure Agreement (NDA) to the requester for execution. Such NDA may be in the form attached hereto. Such conditions may include, for example, (i) PSE’s marking documents or files as “CEII” if PSE determines that such documents or file may contain CEII and (ii) PSE’s receipt of any required NDA executed by requester with respect to such CEII.

(vi) Nothing in this procedure shall excuse PSE from providing access to requester to CEII pursuant to a specific order by the Commission to provide such access to such CEII to requester following denial pursuant to these procedures by PSE of access by such requester to such CEII.

¹ Preventing Undue Discrimination and Preference Transmission Service, Order No. 890 (February 16, 2007).

SUBMIT SIGNED ORIGINAL CEII REQUEST FORM TO:

Puget Sound Energy, Inc.
355 110th Avenue NE, EST-06E
P.O. Box 97034 EST-06E
Bellevue WA 98009-9734

Attn: Manager, Transmission Contracts--CEII Request

Name of Requester:

Requester's street address and phone number:

Name of individual submitting request on behalf of Requester:

Phone number and e-mail address of individual submitting request on behalf of Requester:

Description of information requested:

Statement explaining need for requested information and use to be made of requested information:

Is the Requester willing to sign and abide by an appropriate agreement limiting the Requester's use and disclosure of the information requested?

Yes No

Requester:

Date: _____

By _____
Title _____

From: Richard [mailto:lauckjr@hotmail.com]
Sent: Sunday, February 21, 2016 5:32 PM
To: Nedrud, Jens V; Pravitz, Keri; Energize Eastside -- mail --
Cc: Don Marsh
Subject: New/Revised CEII request from Richard Lauckhart

Jens and Keri-

I am making a new/ revised CEII Request related to the load flow studies PSE performed regarding the Energize Eastside (EE) project. The specific request is for:

1. The study PSE and/or Quanta did for the year 2018 (or similar timeframe) without the EE project in service and all facilities in service (i.e. N-0).
2. All the contingency studies PSE/Quanta did for the year 2018 (or similar timeframe) without the EE project in service in which there were contingency outages of elements of the grid (e.g. the N-1 and N-2 studies or any other contingency studies used to determine the need for the EE line).
3. The study for the year 2018 (or similar timeframe) with the EE line in service and all facilities in service (i.e. N-0)
4. All the contingency studies for the year 2018 (or similar timeframe) with the EE project in service with contingency outages of elements of the grid (e.g. the N-1 and N-1-1 studies, or any other contingency studies used to determine the need for the EE line).

I request all files associated with each load flow run requested above. These files would include at a minimum:

1. areatie.lst
2. buslist.lst
3. flows.lst
4. owner.lst
5. summary.lst
6. .raw file

As you should be aware, a colleague of mine and I have run loadflows on these cases ourselves starting with the WECC Heavy Winter 2018 Base Case. Our results differ from the PSE results. While you told me on November 19 of last year that PSE uses the WECC Base Cases, it is apparent from your Eastside Needs Assessment Report and the Base Case I got from WECC that PSE has modified the WECC Base Case in several ways. In our report we have speculated about what changes you made to the WECC Base Case and why the PSE results were different. We believe our results are more defensible than the PSE results. But we need these files from the PSE load flow runs in order to perform a proper comparison.

As a side note, the last time I requested this information you told me that you would not be providing the

files because in your view I did not have a legitimate need for the data. However, when I asked FERC for the PSE Base Case files saying I needed the files to examine the need for Energize Eastside, FERC approved my request and said my need was a legitimate need. I am attaching FERC's approval letter to this request for your information.

In addition to the load flow data I would like to get historical loading on each of the 230/115 KV substations you consider to be on the Eastside as well as each of the 115/12 KV substations you consider to be on the Eastside. Specifically I request the following data for each of the last 6 years:

For the five highest peak load days on the PSE total system, please provide the one hour total system peak load on those days and the hour on which that peak occurred. Then for those system peak load hours, please provide the one hour peak load on each of the 230/115 KV and 115/12 KV substations in the Eastside. This would result in 5 peak loads on each Eastside substation for each of the 6 historical years.

Thank you for your attention to this matter.

Feel free to call me if you have questions.

Richard Lauckhart
44475 Clubhouse Dr
El Macero, Ca 95618
916-769-6704