

## **“CENSE has issues with the following PSE responses to CENSE data requests”**

**A) CENSE-17 asked for the following files for PSE/Quanta load flow studies, Exhs. DRK-3 and DRK-4: 1) areatie, 2) buslist, 3) Flows, 4) owner, 5) Summary, and 6) .raw file.**

**— PSE response was:—**

*"Puget Sound Energy (“PSE”) objects to CENSE Data Request No 017 as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. PSE further objects to this request as unduly burdensome or expensive. Furthermore, conversion capability to the requested file format is not readily available to PSE and the PSE/Quanta load flow study files contains Critical Energy Infrastructure Information (“CEII”) data which would be designated as EXEMPT per WAC 480-07-160."*

That response is not adequate. David Angell, a VP of the Western Power Pool (formerly NWPP), ran the PowerWorld model on a matter in Montana. I asked him for these same files from his PowerWorld model runs. I am attaching to this email evidence of him sending these files to me. These files need to be provided by PSE. PSE also responds:

*"Attached as Attachment A to PSE’s Response to CENSE Data Request No. 017 is an email to PSE from Richard Lauckhart, an energy consultant contracted by CENSE to act as an expert witness. The email indicates that CENSE had all necessary information from the Western Electricity Coordinating Council base case to run load flow studies and did not need to obtain them from PSE using PSE’s CEII process."*

That response is incorrect. My email says I will be using the WECC Base Case file because I have those even though I would like to be able to use the PSE/Quanta files because it is clear that the PSE/Quanta files differ from the Base Cases...and I want to get the PSE/Quanta files so I can see all the differences.

PSE needs to provide at least the "flows" file from their PowerWorld run. A PowerWorld "Flows" file is available from a PowerWorld load flow model run.

**Without other parties being provided that information for their inspection, there can be no finding of Prudence of Energize Eastside.**

## **PSE Response**

*For the record, CENSE is quoting only portions of PSE's Response to CENSE Data Request No. 017. PSE stands on its entire response to CENSE Data Request No. 017.*

*PSE CEII clearance is needed to obtain PSE's PowerWorld flow information. Any person seeking access to this information would **each** individually need to apply for CEII clearance through PSE's OASIS website at [OATI OASIS](#) under the "CEII" folder. The documents in this folder describe the procedure and form to complete. All other entities that have received this information have obtained CEII clearance. To help expedite review, PSE encourages CENSE to be as specific as possible for what is being requested. To date, neither Mr. Lauckhart nor any other CENSE member or representative has CEII authorization from PSE.*

*If CEII authorization is granted, CENSE's request remains overbroad and unduly burdensome as it is unclear what specific flow information CENSE is requesting. If CENSE is seeking the flow files related to the base cases for the studies utilized in Exh. DRK-3 and Exh. DRK-4, PSE can provide that information. If not, please specify.*

## **CENSE Response to PSE Response**

PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed the keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudency of Energize Eastside.**

**B) Several of the CENSE data requests asked for load on the Eastside (and on the substations on the Eastside). PSE answered in several places that they do not forecast flows on Eastside substations. That is clearly wrong since PSE provides to WECC the forecast loads on all their substations. I surmise that CENSE should assume the**

**substations loads that PSE provided to WECC are the right ones to use.**

**PSE Response**

*CENSE's statement above does not cite the data requests it is referring to or PSE's actual responses to those requests and PSE objects to the extent CENSE is misstating PSE's answers to those data requests.*

*In addressing CENSE's question "I surmise that CENSE should assume the substations loads that PSE provided to WECC are the right ones to use," that is correct for PSE native load, but the WECC substation loads do not account for the transportation load for contractual requirements that PSE must also account for. Substation level loads are determined by allocating the county level load forecast to each substation in the county based on historical loading for each station. The Eastside area is a relative area within King County and substation loading is allocated based on the county forecast. The one difference between PSE's loading and the WECC base case is that PSE's studies also include transportation loads to ensure it plans to accommodate contractual transmission loads. If Mr. Lauckhart, or any other CENSE representative, is provided the base case flow information above following CEII clearance, the substation load information would be included.*

**CENSE Response to PSE Response**

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed the keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.***

**C) CENSE-8 asked for all studies produced in each TPL study over the years, The PSE response was:**

"Puget Sound Energy ("PSE") objects to CENSE Data Request No. 008 as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence because Transmission Planning Assessment studies ("TPLs") are

conducted for the entire PSE system and potentially identify various other PSE system deficiencies other than Energize Eastside. Additionally, TPLs contain significant Critical Energy Infrastructure Information ("CEII"), which would be designated as EXEMPT per WAC 480-07-160."

This is not a proper response. If PSE wants to refer to these studies in support of the prudency request, then PSE needs to provide these reports.

### **PSE Response**

*For the record, CENSE is quoting only portions of PSE's Response to CENSE Data Request No. 008. PSE disagrees with CENSE's assertion above and stands on its response to CENSE Data Request No. 008.*

*PSE's response referenced the relevant portions of the TPLs that pertain to Energize Eastside provided in this case. Other portions of the TPLs contain study results for other projects unrelated to Energize Eastside and PSE stands on its objection that providing this data is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, some information in the TPLs provided contain CEII which was redacted in the versions submitted in this case. Unredacted portions of those TPLs can only be provided to individuals who receive CEII clearance for the data.*

### **CENSE Response to PSE Response**

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed the keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudency of Energize Eastside.***

**D) In several places CENSE asked for documentation of the stakeholder process that is described in found in Attachment 1 at pare 14 of TPL-001-4. PSE responded in several places that such Stakeholder process does not apply to their studies of Energize Eastside. That is wrong. I surmise that CENSE can take from this PSE response that PSE simply chose not to conduct the required Stakeholder process when performing their TPL annual studies.**

**PSE Response**

*CENSE's statement above does not cite the data requests it is referring to or PSE's actual responses to those requests and PSE objects to the extent CENSE is misstating PSE's answers.*

*PSE presumes CENSE is referring to PSE's Responses to CENSE Data Request Nos. 005 and 030. Assuming that is correct, PSE does not agree with CENSE's assertion "that CENSE can take from this PSE response that PSE simply chose not to conduct the required Stakeholder process when performing their TPL annual studies." PSE stands on its responses to those data requests. Specifically, refer to PSE's Response to CENSE Data Request No. 005 for PSE's discussion regarding the applicability of the stakeholder process. Furthermore, although not required, PSE engaged with local Eastside jurisdictions regarding the development of the plans and protocols for its Energy Emergency Plan that relate to the Eastside area and worked with emergency management officials.*

**CENSE Response to PSE Response**

*CENSE stands by its statement above that PSE simply chose not to conduct the required Stakeholder process when performing their TPL annual studies.*

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed the keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.***

**E) CENSE-16 asked if PSE ever sought to include the Energize Eastside project in a regional transmission plan. The PSE response was:**

*"Puget Sound Energy ("PSE") did not seek to include the Energize Eastside project in any regional transmission plan because it is not addressing a regional need."*

*That response does not square with the PSE/Quanta study assumption that Energize Eastside needs to be built in part to assure that 1,500 MW of power can be moved to Canada under a Heavy Winter condition with N-1-1 contingencies.*

**PSE Response**

*CENSE Data Request No. 016 did not ask "if PSE ever sought to include the Energize Eastside project in a regional transmission plan." PSE believes CENSE is referring to CENSE Data Request No. 026. Assuming that is correct, PSE stands on its response to CENSE Data Request No. 026. Please also see PSE's Response to CENSE Data Request No. 015.*

**CENSE Response to PSE Response**

*PSE has not answered this very simple question.*

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed that keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.***

**F) While PSE quotes extensively from the MaxETA report on load flow studies done by MaxETA, when asked for the files from those MaxETA load flow studies PSE states as follows:**

*"Puget Sound Energy ("PSE") objects to CENSE Data Request No. 039 to the extent it seeks documents beyond the scope of PSE's possession, custody or control as it seeks documents from third-party entities that are not participants in this proceeding. Synapse and MaxETA were contracted by the City of Newcastle to support the City's review of PSE's Conditional Use Permit ("CUP") application and provide an independent analysis. PSE provided data and information to Synapse and MaxETA; however, the power flow analysis performed by MaxETA was never provided to or seen by PSE. Therefore, which "power flow models" were run, or analysis ultimately performed by Newcastle's consultant is not known."*

**If PSE wants to rely on language in the MaxETA report, PSE needs to make a witness from MaxETA available to answer data requests and made available for cross examination.**

**PSE Response**

*PSE disagrees with CENSE's assertion and stands on its response to CENSE Data Request No. 039. There is no Commission rule that requires PSE to make a witness from MaxETA available to answer data requests or for cross examination.*

**CENSE Response to PSE Response**

*CENSE stands on its original statement that PSE can not bring into this record information provided by a third party without allowing questions and cross examination of the third party.*

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed the keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.***

**G) CENSE-21 for information about the DRK-1T testimony regarding audits performed by other on TPLs prepared by PSE. PSE responded as follows:**

*"Members of Puget Sound Energy's ("PSE") Transmission Planning team were present and engaged throughout the audit processes related to the North American Electric Reliability Corporation ("NERC") Standard TPL-001. The specific participant names in the audits by the Western Electricity Coordinating Council ("WECC") and Federal Energy Regulatory Commission ("FERC") are only available in the non-public WECC/NERC compliance audit reports."*

**This response is completely inadequate, especially in light of clear evidence that neither NERC nor WECC have ever conducted an audit of PSE TPL studies. Go to the website below**

<https://www.nerc.com/pa/comp/Pages/NERC%20Regional%20Audit%20Reports.aspx>

Open this link and you will find links to all the audits that WECC/NERC have conducted over the years.

Click on the "WECC" tab.

There are links to the audits performed for each of the years 2014-2021. Click on the tab for each of the years 2014-2021. These tabs show the names of the entity being audited. PSE's name does not appear in any of these years.

Click on one of the specific audits in any of these years to get an example of what is in an audit report. Note that each report says, "Confidential Information Has Been Removed, Including Privileged and Critical Energy Infrastructure Information." So, any PSE argument that their audit was not included in this list because of CEII concerns does not hold water.

**PSE Response**

*PSE stands on its response to CENSE Data Request No. 021. PSE cannot say why the 2019 audit information is not available on the NERC website but regardless, PSE was audited.*

**CENSE Response to PSE Response**

Without any hard evidence that such an audit (or audits) was conducted, PSE can not rely on their verbal statement that they were actually audited.

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed that keeps me from disclosing such information if you provide it. Your statement that I have not*

received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.**

**H) CENSE-18 asked the PSE re-run load flow studies DRK-3 and DRK-4 with the gas fired generation turned on and with only 500MW flowing to Canada. PSE responded as follows:**

*"Puget Sound Energy ("PSE") objects to CENSE Data Request No. 018 as unduly burdensome and duplicative with because it requests PSE complete a new load flow study. The requested powerflow analysis would take around four months to complete using the PowerWorld software."*

This response makes no sense. First, it is not necessary to use the PowerWorld software to make these runs. WECC makes the data bases available for PTI and GE PSLF software which should be readily available to PSE load flow modelers. Further changing on the data for the running of (a) the gas fired generators and (b) the flow to Canada could be done in less than an hour. Running the model itself after changing the input data only takes minutes.

**PSE Response**

*For the record, CENSE is quoting only portions of PSE's Response to CENSE Data Request No. 018. PSE stands on its entire response to CENSE Data Request No. 018.*

*PSE disagrees with CENSE's suggestion that re-running the load flow studies would take a few minutes. PSE only uses PowerWorld software for load flow analysis; it does not have PSLF or other software. Running the powerflow and collecting the results for the complete list of 300,000 to 500,000 contingencies system wide that would need to be evaluated takes considerable time. Even with PSE's powerful multi-core (47 core) computers, each scenario (case) takes a day to run, and computational errors when processing this volume of contingencies are not uncommon. Additional runs are needed if these errors occur. Following a successful run, it takes 2-3 engineers multiple days to review the results (2-3 days to review the results). The complete Energize Eastside study supporting Exh. DRK-3 includes 13 scenarios, and the study supporting Exh. DRK-4 includes 6 scenarios (this is shown in Table 2-6 on Exh. DRK-4). In total, that would be 52 days for the Exh. DRK-3 analysis and 24 days for the Exh. DRK-4 analysis*

considering just the N-1-1 portion. In addition, runs with N-0 and N-1 would have to be completed and summarized.

PSE notes further that a more stringent version of the flow scenario CENSE seeks to run was already done in the USE study completed by the City of Bellevue. That study included reducing the flows to Canada to 0 MW, more extreme than the 500 MW being requested, and also evaluated turning on gas fired generation. This was included in the FEIS finding of need.

All of this being said, PSE stands on its response and objections to CENSE Data Request No. 018.

### **CENSE Response to PSE Response**

CENSE stands by its original statement that PSE needs to rerun load flow studies DRK-3 and DRK-4 with the gas fired generation turned on and with only 500MW flowing to Canada. The WUTC as much as required this in their 2018 Acknowledgment Letter in the PSE IPR. Data Request rules for these proceedings require PSE to make load flow runs requested by intervenors if requested when the intervenor does not have easy access to models that PSE has used in the proceeding.

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed that keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.***

**I) CENSE 43 asked PSE to identify all substations that would be served by the Energize Eastside project and provide for each winter peak loads, summer peak loads, and the duration of such load for the period from 2006 to the present. PSE provided a list of substations impacted by CAPs.**

Those PSE listed 12 KV substations include substations north of Samammish substation that can be served by other 230/115 KV substations such as Echo Lake, BPA Snohomish and Beverly Park. Those listed 12KV substations also include substations south and east of Talbot Hill that

can be served by other 230/115 KV substations such as OBrien, Berrydale, White River, BPA Tacoma, and Tacoma City Light SW.

Clearly a failure of a bank at Sammamish or Talbot Hill or both during a heavy load situation would not require load shedding at all these 12 KV substations. The other nearby 230/115 KV substations would be available in such an emergency to supply customers served by these other listed substations. And these other substations can be loaded to their emergency ratings in such an event. Lauckhart-Schiffman report ran a low flow study under heavy winter loading conditions with a 230/115 KV transformer out at Sammamish followed immediately by a 230/115 KV transformer out at Talbot Hill. These other substations are shown to load up under these condition and nothing is overloaded. See page 10 of Lauckhart-Schiffman report.

### **PSE Response**

*It is unclear what CENSE is asking in the above. PSE stands on its response to CENSE Data Request No. 043. PSE provided a list of substations served by the Energize Eastside project which were identified as benefiting from the project and not subjected to corrective action plans (CAPs) including load shedding. PSE included peak loading for winter and summer for King County and the Eastside area. PSE did not include the specific substation loading as that contains confidential customer information for specific customers with dedicated substation facilities. It is unclear what the “duration of such load” meant as it does not relate to peak usage.*

### **CENSE Response to PSE Response**

CENSE stands on its original statement that Page 10 of the Lauckhart-Schiffman report demonstrates that these “other” substations are shown to load up under these conditions and nothing is overloaded. See page 10 of Lauckhart-Schiffman report.

*PSE cannot legitimately refuse to provide CEII material in this proceeding. FERC Order 630 has stated that Energy Consultants need to be able to get access to CEII information they need. They do that by signing a FERC approved NDA. I have done that. Further there is a Protective Order in this proceeding that I have signed the keeps me from disclosing such information if you provide it. Your statement that I have not received authorization from PSE to receive your CEII is **disingenuous**. In 2016 I followed your procedure, but on March 22, 2016 George Marshall sent me a letter rejecting my request for CEII on a number of grounds including for the reason that I do not have armed guards at my home to assure that terrorists will not break into my home and get the requested data files. **Until PSE provides this CEII data for inspection by me, there can be no finding of Prudence of Energize Eastside.***