

Lauckhart second set of public comment on UE - 200304...PSE Integrated Resource Plan

I am an Energy Consultant and past VP at Puget. My Bio is provided in Exhibit RL-2 which is one of the Exhibits I have requested be made a part of this proceeding UE-200304.

On December 22, 2022, the WUTC issued its Final Order in UE-220066. In that Final Order the Commission devoted 45 paragraphs to the matter of the Prudency of Energize Eastside. I was the expert witness testifying that Energize Eastside was imprudent. The Commissions discussion of many of the details in these 45 paragraphs is incorrect.

The Commission has Ordered that the Full Prudency Review will be delayed until the project is built and placed into service. It is not clear when that proceeding might commence and how it will be run. I intend to participate in that future hearing and I will want all the Exhibits I filed in UE-220066 to be on the record for that proceeding. On December 24, 2022 I provided comment in this proceeding which comment, among other matters, indicated I will want all the Exhibits I filed in UE-220066 to be on the record in this IRP proceeding UE-200304.

There will be a few differences in that future Prudency hearing than what occurred in UE-220066 as follows:

- 1) PSE finally provided me the input and output of their load flow studies they ran in 2013 and 2015. It was too late to get my review of these data files on the record in UE-220066. **But I have submitted my findings on the 2013 and 2015 input and output studies in this IRP proceeding and I will use what I learned from that review in the future hearing on the Prudency of Energize Eastside.**
- 2) PSE has never submitted the final design of Energize Eastside to the WUTC. That will be a moot matter in the future proceeding because the line will have been built. Height of the steel poles will be known. Location of those poles will be known. We will know (a) where PSE was able to locate the much higher voltage lines on the right of way in comparison to the location of the Olympic pipelines and, (b) whether in order to comply with safety regulations, these pole locations required getting variances from homeowners along the route to the Easements these homeowners have regarding the existing right-of-way.
- 3) The Commission criticized us for not making motions to compel to PSE for the information we requested in data requests that PSE refused to answer. We will be making a number of motions to compel in that future proceeding.
- 4) We will be seeking the load flow studies that the Commission thinks were done on the alternatives we listed. **We do not believe that PSE ever ran those load flow studies.** If they did, were there also fatal flaws in those load flow studies as well?
- 5) The current draft IRP in UE-200304 states that PSE needs to add new peaking resource in the near future. But the WUTC Final Order in UE-220066 states that "the Company evaluated each of these alternatives and found that they were either not viable or more expensive than the Energize Eastside project." Clearly both documents can not be correct. Somebody needs to explain how PSE takes one position in one forum and then a completely different position in a different forum.

My comments in this proceeding UE-200304 make it clear that as of this date (if not earlier) any Board decision to continue to spend money on Energize Eastside is imprudent.