

Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE, Lacey, WA 98503
P.O. Box 47250
Olympia, WA 98504-7250

February 27, 2020

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

02/27/20 13:12

Received
Records Management

Ref: Docket 191023

Subject: Montana Transmission Rights

Dear Commissioners and Staff:

I am writing to you today to request that the Commission not approve the proposed transfer of a portion of Montana transmission rights, as has been reported, from Puget Sound Energy to Northwest Energy. I believe this has a profound relationship to this docket as I will explain below.

1. PSE has confirmed to me that the Aurora analysis done in preparation for their December 11, 2019 Social Cost of Carbon Webinar has identified Montana Wind as the lowest cost resource for new energy acquisitions. A reduction in the available transmission capacity and subsequent reduction of Montana wind energy will mean that future plans will not be the lowest cost solution possible.
2. PSE's peak load occurs in the Winter season so new resources need to be optimized accordingly. Significantly more nameplate energy is required for WA resources than MT wind to meet winter peak load. This is because wind and solar resource Capacity Factors (actual energy produced divided by Nameplate Rating) also vary seasonally and result in huge differences in the output. MT wind winter CF is above 60%, WA wind is significantly below 30 %, WA solar is below 10%. This means it takes over twice as much nameplate capacity for WA resources to meet the winter load. Renewable resources are limited. MT wind is the more abundant resource after CF's are considered. All of the current transmission capacity is needed to capitalize on this.
3. The E3 study suggests we need to significantly increase transmission infrastructure to meet future requirements. Why would PSE want to reduce its most valuable transmission now?
4. I believe the transmission line to Colstrip was funded by ratepayers and should have a say in this matter. PSE should not be allowed to dispose this valuable asset in this manner.

It is my request that the commission fully explore the implications of this proposed transfer of transmission rights and its effects on the CETA process and deny this transfer.

Thank you,

Willard Westre

Mechanical Engineer
Union of Concerned Scientists
PSE TAG member
15704 SE 44th St Bellevue 98006
425 213-4818