EXHIBIT NO. \_\_\_\_\_ (CBY-5)

DOCKET NOS. UE-170033/UG-170034

2017 PSE GENERAL RATE CASE

WITNESS: CAMERON B. YOURKOWSKI

BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PUGET SOUND ENERGY,  Respondent. | DOCKETS UE-170033 and UG-170034 (Consolidated) |

EXHIBIT CBY-5 TO PREFILED RESPONSE TESTIMONY

(NON-CONFIDENTIAL) OF CAMERON B. YOURKOWSKI

ON BEHALF OF NW ENERGY COALITION

JUNE 30, 2017

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-170033 and UG-170034**

**Puget Sound Energy**

**2017 General Rate Case**

**NWEC-RNW-NRDC** **DATA REQUEST NO. 014**

**NWEC-RNW-NRDC DATA REQUEST NO. 014:**

Has PSE conducted any transmission engineering studies regarding whether the current transfer path rating of the Colstrip transmission system will be maintained after the closure of Colstrip Units 1 and 2?  If the answer is “yes,” please provide a copy of any and all such studies.   If the answer is “no,” please indicate whether and when PSE plans to conduct such analysis.

**Response:**

Puget Sound Energy (“PSE”) is not the Transmission Operator of the Colstrip Transmission System (“CTS”) and is not best situated to conduct, and has itself not conducted, “any transmission engineering studies regarding whether the current transfer path rating of the Colstrip transmission system will be maintained after the closure of Colstrip Units 1 and 2.” However, please see the following attached studies that consider the impacts of Colstrip retirements:

Attached as Attachment A to PSE’s Response to NWEC-RNW-NRDC Data Request No. 014 is a PDF of NorthWestern Energy’s “EPA 111‑D Consideration Retirement of CS units 1&2” dated April 2015.

Attached as Attachment B to PSE’s Response to NWEC-RNW-NRDC Data Request No. 014 is a PDF of NorthWestern Energy’s “EPA 111-D Clean Power Plan Consideration Study: Retirement of All Coal-Fired Generation in Montana” dated November 2015.

Attached as Attachment C to PSE’s Response to NWEC-RNW-NRDC Data Request No. 014 is a PDF of Northern Tier Transmission Group’s Draft “NTTG Study Report for the 2016-2017 Public Policy Consideration Scenario” dated May 8, 2017.

Attached as Attachment D to PSE’s Response to NWEC-RNW-NRDC Data Request No. 014 is a PDF of ColumbiaGrid’s “Economic Planning Study Impacts from Coal Shutdown Final Study Report” dated June 18, 2015.

As discussed above, PSE is not the Transmission Operator of the CTS and has not conducted any transmission studies regarding whether the current transfer path rating of the Colstrip transmission system will be maintained after the closure of Colstrip Units 1 and 2. See the discussion of the Acceleration Trend Relay (“ATR”) and the discussion of some of the complexity of analyzing the response of the ATR in Attachment A, NorthWestern Energy’s “EPA 111‑D Consideration Retirement of CS units 1&2” dated April 2015. See also Attachment B, NorthWestern Energy’s “EPA 111-D Clean Power Plan Consideration Study: Retirement of All Coal-Fired Generation in Montana” dated November 2015 at pages 9-10:

“Currently, the Colstrip units are protected by the ATR which senses acceleration on the four coal-fired units and trips a combination of the units in order to maintain stability on the transmission system. While the ATR itself would no longer be required if all of the Colstrip facility is taken out of service, a RAS or multiple RASs will be necessary to protect the transmission system during outage and contingency events. Any RAS can only be developed once the state of the system is known.”

In general, the location and characteristics of a replacement resource may affect the path rating.

**ATTACHMENT A to PSE’s Response to**

**NWEC-RNW-NRDC** **Data Request No. 014**

**ATTACHMENT B to PSE’s Response to**

**NWEC-RNW-NRDC** **Data Request No. 014**

**ATTACHMENT C to PSE’s Response to**

**NWEC-RNW-NRDC** **Data Request No. 014**

**ATTACHMENT D to PSE’s Response to**

**NWEC-RNW-NRDC** **Data Request No. 014**