From:	Richard Lauckhart
To:	Public Involvement (UTC)
Cc:	Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG); Dallas, Joe (UTC)
Subject:	Re UE-220066....Alternatives to Energize Eastside if needed
Date:	Monday, April 11, 2022 7:22:24 AM

External Email

Dear WUTC-

I am participating in proceeding UE-220066 as a public commenter. I have considerable information to put on the record in UE-220066 regarding the prudency of Energize Eastside.

This is the fifth set of public comments I am making on the Prudency of the PSE Energize Eastside project.

As I have previously commented, the Lauckhart-Schiffman study evidences that there are no reliability problems on the eastside.

But if somehow the WUTC finds there is a reliability problem, there are four prominently identified alternatives that are much better than building Energize Eastside. Those alternatives are:

1) **Using the existing Seattle City Light line instead.** Seattle City Light owns a large double circuit 230 KV line that parallels the proposed Energize Eastside transmission line. It is located a short distance West of the proposed Energize Eastside transmission line. Under FERC "Reciprocity" rules SCL is obligated to make its lines available to others if formally requested to do so. SCL has formally adopted its own FERC compliant Open Access transmission agreement. PSE claims that SCL said they preferred PSE not use its line. But PSE never formally requested to be allowed to use the SCL line. SCL has said that if PSE would have requested to use the SCL line that SCL would have discussed how that would be done. A short "loop" of the SCL line through the PSE Lakeside substation would accomplish what needs to be done. While PSE would need to pay for the cost of looping the existing SCL line through the Lakeside substation, such cost would be much lower than the cost of building Energize Eastside. And the safety risk caused by locating Energize Eastside on the same corridor as the Olympic Pipeline would be greatly reduced.

2) **The Lake Tradition alternative.** The existing PSE Lake Tradition 115 KV switching station near the City of Issaquah includes several 115 KV lines that serve the eastside. There is no 230/115 KV transformer in this switching station. An existing BPA 230 KV line is literally within a stone's throw from the Lake Tradition switching station. PSE has long recognized that looping the existing BPA 230 KV line through the Lake Traditions switching station and installing a 230/115 KV transformer there would be a good plan if the eastside load grew to

the point of needing more 230/115 KV transformation. A prudent decision would be to study this alternative rather than pursuing Energize Eastside.

3) **A small peaker plant located near the load in the city of Bellevue** so there is no need to build Energize Eastside. The most recent PSE IRP indicates that PSE needs to add more peaker power plants in order to have enough power to cover their peak load. The IRP further states that the peaker needs to be fueled with biodiesel which is a CETA compliant fuel. Locating such a peak near the load in the City of Bellevue to avoid building 18 miles of new 230 KV transmission is the prudent thing to do. Further, in order to provide for "environmental justice" in the locating of power plants, it is time that the City of Bellevue hosts such a peaker plant. To date, the City of Bellevue has avoided any adverse environmental impacts from power plants because the power plants serving Bellevue have all been located where the adverse environmental impacts affect others. That is not environmental justice.

4) **A cocktail of Demand Side Management programs**...Demand Side Management (DSM) programs include (a) energy efficiency measures (e.g. insulation and double pain windows) put in customer premises, (b) rate incentives to cause customers to reduce load during peak load hours, (c) batteries to provide a source of power near the load when needed, (d) decentralized located small generators, etc. The draft Synapse report strongly criticized PSE for not making more effort to accomplish a cocktail of these DSM programs. Prudent planning would involve more activity on this front rather than just looking for a Transmission Solution. Especially if Energize Eastside is the proposed transmission solution that is extremely costly and suffers from safety problems to PSE customers.

There is clear evidence that there is no reliability problem on the transmission grid on the eastside. But if the WUTC believes otherwise, then any of the above 4 alternatives need to be seriously studied before it is determined that building Energize Eastside is a prudent use of PSE ratepayer funds.

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