From:	Richard Lauckhart
To:	Public Involvement (UTC)
Cc:	Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG); Dallas, Joe (UTC)
Subject:	Re UE-220066..What the WUTC said about Energize Eastside in the WUTC Acknowledgement Letter in UE-160918
Date:	Friday, April 8, 2022 4:27:00 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.

On April 7, 2022 I send to you comments saying "**ON THE BASIS OF SAFETY ALONE, THE WUTC SHOULD FIND PSE'S INVESTMENT IN ENERGIZE EASTSIDE TO BE IMPRUDENT."**

My comments today address what you have already said about Energize Eastside in the WUTC Acknowledgement Letter in UE-160918.

Proceeding UE-160918 dealt with the PSE 2017 IRP. The WUTC staff and myself and others provided considerable comment/concern regarding Energize Eastside and how PSE was treating that in their IRP. The June 19, 2018 WUTC Acknowledgement Letter in that proceeding provided a list of several matters related to Energize Eastside that needed to be dealt with in the future. PSE has failed to do that. For example, the Acknowledgement Letter stated:

the Plan does not include a narrative regarding:

The effect of the power flows due to entitlement returns on the need for the Energize Eastside Project.

The reason for, and effect on the need for the Energize Eastside Project, of modeling zero output from five of PSE's Westside thermal generation facilities.

PSE's choice not to provide modeling data to stakeholders with Critical Energy Infrastructure Information clearance from FERC.

Resolution of the effect of lower load assumptions on the need for Energize Eastside Project.

These problems have still not been addressed by PSE. Note:

Regarding power flows to Canada...PSE has never provided any contract that PSE has entered into which requires PSE to pay for transmission infrastructure improvements to enable their transmission grid to provide for 1,500 MW of flows to Canada under extreme winter peak conditions with N-1-1 or N-2 contingencies. PSE has failed to correct their load flow studies to remove the requirement that PSE ratepayers pay for the cost of upgrading their transmission

lines to enable 1,500 MW to flow to Canada under these conditions.

Regarding modeling zero output from five of PSE's Westside thermal generation facilities...PSE has never explained why their load flow studies modeled these power plants at zero output. PSE has failed to correct their load flow studies to show these plants operating full out in extreme winter peak conditions. WUTC Base Cases show these plants running full out under winter peak load conditions.

Regarding PSE's choice not to provide modeling data to stakeholders with Critical Energy Infrastructure Information clearance from FERC...PSE has still not provided this information. Clearly PSE is using data in its load flow studies dealing with Energize Eastside that differ substantially from what PSE tells WUTC to include in WUTC Base Cases. What is needed is a "data autopsy" on the data that PSE used when attempting to justify Energize Eastside. PSE continues to hide the ball on this information so we cannot know what all they chose to vary from what they told WECC and why they varied.

Regarding Resolution of the effect of lower load assumptions on the need for Energize Eastside Project...PSE refuses to show the latest forecast and actual load on the 18 substations that are in the Energize Eastside area. They clearly have that data available, but they claim that the load in King County is all they are willing to provide.

ON THE BASIS OF PSE'S FAILURE TO ADDRESS THESE ISSUES RAISED IN THE 2017 PSE IRP ALONE, THE WUTC SHOULD NOT AGREE THAT PSE'S INVESTMENT IN ENERGIZE EASTSIDE IS PRUDENT

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