From:	Richard Lauckhart
To:	Public Involvement (UTC)
Cc:	Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG); Dallas, Joe (UTC)
Subject:	Re UE-220066....Discussion of the Dan Koch testimony on the prudence of Energize Eastside and the MaxETA/Synapse report he relies on
Date:	Tuesday, April 12, 2022 7:10:48 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 sixth set of public comments I am making on the Prudency of the PSE Energize Eastside project.

In his Prefiled Direct Testimony in this proceeding (DRK-1T), Daniel Koch provides the basis for PSE's belief that Energize Eastside is needed and is a prudent investment. But there are many problems with his testimony as follows:

1) At page 50 of DRK-1T Mr. Koch testifies that PSE is audited by the Western Electricity Coordinating Council ("WECC") on behalf of NERC for compliance with all NERC standards and is subject to substantial penalties for failure to comply with the NERC standards. But as I point out in my third set of public comments in this proceeding sent on April 9, 2022, the only list of audits performed by WECC and NERC can be found at:
https://www.nerc.com/pa/comp/Pages/NERC%20Regional%20Audit%20Reports.aspx
An examination of the list of all the audits of NERC standards performed by WECC and NERC in the years 2014 to today evidences the truth that PSE has not been audited by WECC or NERC in any of these years for compliance with any FERC/NERC reliability standards. <u>That is why PSE has not provided a copy of any audit report related to their annual TPL studies.</u>

2) Mr. Koch discusses matters related to the PSE load forecast. That discussion is irrelevant for this proceeding because the WUTC should only be interested in what loads PSE has provided to WECC so that WECC can prepare Base Cases as required by FERC. WECC has a number of Base Cases that they can provide under non-disclosure agreements. I have collected a number of those WECC Base Cases. Synapse also asked for and got WECC Base Cases from WECC in order to understand what PSE loads were on each of the substations on the eastside in Heavy Winter load conditions and also in Heavy Summer load conditions. PSE should not be using loads that differ from what they told WECC in their studies. I have examined loads on the PSE eastside substations. PSE has been reducing these loads. PSE needs to have correct substation loads for WECC Base Cases because other utilities in the WECC, including (a) Seattle City Light and (b) the Bonneville Power Administration (who also have loads in King County); both use these WECC Base Cases for their own transmission

reliability studies. PSE has not updated the PSE/Quanta load flow studies since 2013 or 2015. The loads in their load flow studies are higher than what they are telling WECC now. The PSE/Quanta 2013 and 2015 load flow studies need to be updated. Choosing not to update their studies is imprudent.

3) Mr. Koch attaches the report that MaxETA/Synapse prepared for the City of Newcastle as his Exhibit DRK-12. His testimony neglects to mention that MaxETA/Synapse found no winter transmission system problems on the eastside. MaxETA/Synapse got recent WECC Base Cases with the more recent PSE forecast of loads on the 18 substations on the eastside. When MaxETA/Synapse ran their load flow studies they found no transmission problems on the eastside in the winter. That is fully consistent with the Lauckhart-Schiffman study. PSE has made no attempt to discredit the MaxETA/Synapse finding that there is no transmission reliability problem on the eastside in the Winter.

4) Mr. Koch relies on the MaxETA/Synapse **alleged** finding of a Bulk Electric System vulnerability in King County in the summer as a demonstration of "NEED" for Energize Eastside. But MaxETA/Synapse did not run any load flow studies or Transient Stability studies that demonstrated that there was a Bulk Electric System vulnerability in King County in the summer. (*Note: In response to a Public Record Act request, MaxETA/Synapse made it clear that they just got recent WECC Base Cases from FERC and made some load flow runs with those. But they never ran a load flow study that demonstrated there was a Bulk Electric System vulnerability in either King County or the Eastside. Further, they never ran any study that demonstrated that Energize Eastside would solve this unidentified problem*).

The information that MaxETA/Synapse relied on to conclude there is a Bulk Electric System vulnerability in King County can be found on Exhibit DRK-12 at pages 24 and 25 of 33 pages. The insights gained from pages 24 and 25 of DRK-12 include:

a) At page 24 MaxETA/Synapse make it clear that they are relying on PSE's assumption of a King County threshold of 1,594 MW on Figure 10. MaxETA/Synapse did not develop this number.

b) Figure 10 on DRK-12, page 25 shows that for every year starting in 2008 until today, the actual load exceeded the PSE estimated 1,594 MW Threshold. If PSE believes that is true, then PSE is under a FERC/NERC obligation to address/fix that problem ASAP. And if not fixed, then PSE needs to have "self-reported" a violation of FERC/NERC reliability criteria. And PSE would be assessed big fines by FERC for (a) failing to self-report a violation, and (b) failing to address the problem. If the MaxETA/Synapse finding of a Bulk Electric System vulnerability in King County is true, then PSE needs to be working with Seattle City Light and Bonneville Power to determine the best fix for the problem. However, since no other reliability organization is aware of this problem and since MaxETA did not run load flow studies that demonstrated that such problem exists, then likely no such problem exists. Therefore, MaxETA/Synapse have actually found that (a) there is no winter problem that needs to be addressed by building

Energize Eastside and (b) there is no summer problem that needs to be addressed by building Energize Eastside.

THE MaxETA/SYNAPSE REPORT DEMONSTRATES THAT ATTEMPTING TO BUILD ENERGIZE EASTSIDE IS IMPRUDENT

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