From:	Richard Lauckhart
To:	Public Involvement (UTC)
Cc:	Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG); Dallas, Joe (UTC)
Subject:	Re UE-220066..PSE has provided absolutely no concrete evidence that Energize Eastside is needed, or that if something is needed, it would be prudent to choose a different prominently identified alternative
Date:	Saturday, April 9, 2022 7:11:55 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 third set of public comments I am making on the Prudency of the PSE Energize Eastside project.

As the WUTC acknowledged in their Acknowledgement Letter in UE-160918, PSE has refused to provide modeling data to stakeholders with Critical Energy Infrastructure Information clearance from FERC.

PSE argues that it does not need to provide that data because they study Energize Eastside in their Annual Transmission Planning Assessments. But this PSE argument fails because:

1) PSE has provided no TPL-001-4 Annual Transmission Planning Assessment report in this or any other proceeding.

2) TPL-001-4 has a requirement for Stakeholder Involvement. But PSE erroneously claims that the Stakeholder process described in Attachment 1 to TPL-001-4 is not applicable when it comes to updating a study of the need for Energize Eastside in an Annual TPL-001-4 Transmission Planning Assessment. That argument makes no sense.

3) PSE says that WECC performs audits of its Annual TPL-001-4 Transmission Planning Assessments. But a listing of which entities have been audited by WECC and NERC can be found at:

https://www.nerc.com/pa/comp/Pages/NERC%20Regional%20Audit%20Reports.aspx

Open this link and you will find links to all the audits that WECC/NERC have conducted over the years.
Click on the "WECC" tab.
There are links to the audits performed for each of the years 2014-2021. Click on the tab for each of the years 2014-2021. These tabs show the names of the entity being audited. PSE's name does not appear in any of these years.

Click on one of the specific audits in any of these years to get an example of what is in an audit report. Note that each report says, "Confidential Information Has Been Removed, Including Privileged and Critical Energy Infrastructure Information." So, any PSE argument that their audit was not included in this list because of CEII concerns does not hold water.

PSE has not provided any such WECC/NERC audit report of its annual TPL-001-4 Transmission Planning Assessments because no such audit is listed by WECC/NERC.

PSE also argues that the FERC Order in the Johnson/Lauckhart Complaint at FERC makes it clear that the PSES/Quanta studies were done correctly, which PSE claims means that FERC agrees that Energize Eastside is necessary to meet reliability requirements. That claim is false. A reading of that FERC Order makes it clear that FERC decided that since (a) Energize Eastside is completely located in the PSE service territory, AND BECAUSE PSE never asked for the line to be included in a Regional Transmission Plan; that FERC has no jurisdiction over Energize Eastside and any need for Energize Eastside needed to be decided by the State of Washington. That being the case, PSE had the option of either (a) attempting to permit the project at EFSEC or (b) to seek permits from the individual cities such as Newcastle. PSE chose the latter, which itself was an imprudent decision because of the cost and lengthy time compared to the EFSEC process. PSE has already spent over $100 Million on permitting of Energize Eastside and still does not have all its needed permits after 8 years of trying.

PSE also argues that FERC Reliability criteria TPL-001-4 requires PSE to build transmission to address any transmission reliability problems it finds when doing TPL-001-4 Transmission Planning assessments. But that is not true. TPL lists many actions that are allowed to be taken to address any transmission reliability problems it finds. TPL 001-4 requires an analysis of system deficiencies. But at page 4, the rule lists the "associated actions needed to achieve required system performance." Though "installation of transmission" is one of those "associated actions," several other actions are listed, including "Operating Procedures" as well as "use of rate applications, DSM, new technologies or other initiatives." There is no one required "associated action" or "solution." Instead, a utility must plan a solution that will eliminate the deficiency.

PSE has provided absolutely no concrete evidence that Energize Eastside is needed, or that if needed, that other prominently identified alternatives (*such as a small peaker located near the load in Bellevue, or use of the Existing Seattle City Line, or a new 230/115 KV transformer at the PSE Lake Tradition substation, or a cocktail of DSM activities such as rate design or battery installations*) would be more prudent to invest in rather than Energize Eastside.

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