From:	Richard Lauckhart
To:	Public Involvement (UTC)
Cc:	Cameron-Rulkowski, Jennifer (UTC); Gafken, Lisa (ATG); Dallas, Joe (UTC)
Subject:	Re UE-220066....Lauckhart/Schiffman Load Flow study showing Energize Eastside is not needed
Date:	Sunday, April 10, 2022 7:18:47 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 fourth set of public comments I am making on the Prudency of the PSE Energize Eastside project.

As the WUTC stated in their Acknowledgement Letter in UE-160918, the IRP does not include a narrative regarding three key items related to their examination of the need for Energize Eastside. These three items are:

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

PSE has chosen not to modify their load flow studies to adjust for these three items. Nor has PSE run a series of load flow studies for a heavy summer peak load situation.

The Lauckhart-Schiffman load flow study dated February 18, 2016 corrected for these three items. The Lauckhart-Schiffman load flow study was provided to the WUTC on July 25, 2017 in connection with the PSE IRP Docket No. UE-160918.

The Lauckhart-Schiffman load flow study found there are no transmission reliability issues on the Eastside in a heavy winter load flow situation. That study also addressed the heavy summer situation in its Appendix G. As Appendix G states, the heavy winter loads on the 18 substations on the Eastside total 402 MW. The heavy summer loads on the 18 substations on the Eastside total 281 MW. There is no generation on the eastside, so all generation needed to feed these 18 substations needs to be brought in from outside the eastside geographic area. The problem with the PSE/Quanta load flows studies of Energize Eastside is that the 1,000+ MW of PSE Westside thermal generation that they decided to take offline during the winter peak *(much more than the 402 MW of Eastside load*) is the generation that is designed

to serve these eastside loads. Taking them offline during a heavy winter peak results in problems with the transmission system on the eastside. PSE/Quanta should have rerun their load flow study to see if any transmission deficiency remained if those power plants were running full out. WECC Base Cases have these projects running full out in a heavy winter condition. **The Lauckhart-Schiffman study turned these plants on and we found no transmission reliability problem on the eastside.** Further, Appendix G of the Lauckhart-Schiffman study explains why it is clear that no summer problem exists even without having to run a heavy summer load flow study.

The Lauckhart-Schiffman load flow study used the loads that PSE had provided to WECC in 2015 for WECC Base Cases in year 2018. These loads were considerably lower than the loads used by PSE/Quanta in their load flow studies. Since February of 2016 when the Lauckhart-Schiffman studies were run, loads have proven to be even lower than what Lauckhart-Schiffman used. Making the finding of the Lauckhart-Schiffman load flow study work even more legitimate that there are no transmission reliability problems on the eastside.

The Lauckhart-Schiffman load flow study corrected flaws in the PSE/Quanta load flow studies. When these flaws are corrected, it is clear there are no transmission reliability problems in the PSE Eastside area. That being the case, any money PSE continues to spend on Energize Eastside is imprudent.

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