

January 12, 2018

Washington Utilities and Transportation Commission

Comments RE: PSE November 2017 Integrated Resource Plan
Chapter 8-“Delivery Infrastructure Planning” Pages 8-30 to 8-53
Docket Numbers UE-160918 and UG-160919

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As a resident, living along the proposed Energize Eastside project, I have been actively involved in this for over 4 years. This is what I have learned in that 4 years and it aggravates me to no end there is still an Energize Eastside project in our discussions.

PSE has checked off all the boxes in community engagement—starting with a year long process paid for by PSE to find the favored route for this project. We were herded by the moderator down the path that PSE wanted. I was on this CAG committee when I was called at home by the moderator for being “disrespectful” after saying at one meeting I thought PSE was “lame” in not pursuing Seattle City Light to share their corridor or using some power from that line for covering the “small amount of power needs” defined by PSE on a few extremely cold mornings on the Eastside. This Seattle City Light line runs about 1/2 mile from the proposed PSE corridor in my area. PSE’s original story was that 1500 MW of power was also needed for Canada which would never be allowed if our area was in stress. Mark Williamson, from out of state-PRW Communications, was hired by PSE to get this project done on time and under budget—using “campaign styles tactics” as quoted on his website. Lowell Rogers, then of Power Engineers, was Williamson’s sidekick, and hired by PSE. In the EIS—which SHOULD be an independent analysis of the environment uses Rogers quotes and before and after photo simulations. This is unacceptable and biased by PSE influence as a PSE paid contractor. Lowell Rogers continues to show up with PSE staff, just recently at the city of Bellevue PSE Application meeting for the public.

I asked the WUTC in the past— who has oversight of PSE projects? You replied —no oversight before construction—only after—when rates get approved after a project. Isn’t that putting the cart before the horse? You can see PSE’s declining operating profits from 2011-2016. Of course, to make more money they need to build unneeded infrastructure to obtain the almost 10% return you allow them. Bonneville recently cancelled a huge project in SW Washington due to lower demand and replaced it with smart technologies and batteries offering a better alternative to a huge transmission project. The battery project is less costly and less construction time. Better results for all! That is the way it should be!

PSE needs oversight to do the obvious and be incentivized for doing the right thing—but EE will make them much more profit building poles and wires on an unbid project basis! In the last 4 years, batteries, which were dismissed by PSE at the time, have advanced and are far cheaper today. PSE needs to do what is prudent and you need to put PSE on notice that if it should build Energize Eastside they will not be allowed to increase rates for this project.

If this project is so needed—and to this capacity—and so dire for “rolling blackouts” as PSE threatens, then it should have been a slam dunk for PSE to go to EFSEC for approval. Instead, they chose to involve 4 city councils for 4 years who have no clue about power planning. Shouldn’t everyone listen when a “major power utility” raises a red flag about our power needs? As PSE says: Look at all the

growth on the Eastside and we need to upgrade our system for reliable power with all this growth. The Eastside power has not been upgraded since 1960's they say. Yet in truth—there have been 3-115KV line built since the 1960's and the demand for power since 2011 is down. PSE forecasts are exaggerated and shows their demand rate is 4 times higher than that of Seattle City Light. Data needs be updated by PSE before PSE is allowed to destroy our cities, neighborhoods, trees and place the Olympic pipelines at risk for a disaster in dense populated areas.

PSE will not share their numbers for an independent load flow study to be done. Why are they not being transparent if they are so correct? Why do you not require that of a privately owned foreign corporation that is for profit and currently looking to sell Puget interests. Macquarie is not in it for the long haul nor looking to protect ratepayer interests. Where do ratepayers get protection? I pay taxes and expect my government to protect me. Instead, I have spent over \$16K out of pocket fighting this project. How is that right? This project is over-scaled, too expensive and too unsafe being built within feet of two Olympic hazardous jet fuel pipelines—16" and 20" diameter transporting 13 million gallons of jet fuel by my house and through my neighborhood daily in only a 100' right of way from house to house! PSE says SAFETY is their first priority—yet look at all the PSE unsafe practices that have resulted in huge fines over the years.

My biggest question from the start of my involvement came from a quote in Phase 1 of the EIS—quoted by AEP-Ohio—that a 230KV line requires 120'-150' right of way. Here, we have a 100' ROW between homes (roof to roof) with 2-230KV lines (each will be on separate poles outside the 2 Olympic pipelines because they are central —taking about 15' down the center.

So first, I assumed that they would have to take a row of homes to build this project. But no, PSE said — no homes would be taken. Since this could never be deemed an essential public facility—they would have one hell of a fight trying to take our properties. Safety is more important than a house. There must be proper ROW distances for safety. With that, I called several power companies around the US and talked to facility planners about the required ROW for 1-230kV line—the least ROW space was 110'. Then asked if there were 2 -230 kV lines? There would have to be more space was the reply. Then, I added the 2 hazardous jet fuel pipelines central to the ROW—they said that would definitely require more space and study. One guy told me I should move! You can understand my frustration! Too many things PSE says or proposes cannot be verified as true or safe. Newcastle has defined a 60' pipeline zone unsafe for construction in our codes-yet PSE is seeking a variance to place these poles closer to the pipelines to get this project through our city.

Oversight is exactly what this company needs! The WUTC needs to change the incentive for profit for building infrastructure now at almost 10% return. This is an insane and archaic proposition—and should this project get approved and you allow them to pass these costs on to the ratepayers—it will be nothing short of fraud —charging us for an unneeded project.

There are newspaper articles that tell of other utilities trying to build unnecessary infrastructure that have similar motivations in the US—and these projects have been stopped. It is an outdated incentive and instead should be rewarded for doing what is prudent and honest—not profit driven by unnecessary construction, lies and false advertisements. Did I read recently where WA state already has issued an order that energy storage must be considered as an alternative to transmission projects? PSE is ignoring the state and continues on its path.

The WUTC says projects must be prudent and cost sensitive. The alternatives to this project were NEVER studied in earnest. PSE quoted outdated under-grounding methods and costs, they never looked into Seattle City Light sharing their corridor or buying power for short term stress periods, and they totally dismissed batteries and storage—which now in the last 4 years—many US city have solved this shortage problem (if there truly is a problem) with 21st century solutions. We live in the tech capital of

the region and we still are “industrializing” our beautiful neighborhoods with poles and wires. We deserve better. Batteries are the NOW solution! Batteries are the proper resource to providing a few minutes of power shortfall, maybe once a year for a minimal time.

PSE should not be able to increase our rates if Energize Eastside is built! PSE has already spent \$50 million on this project—originally budgeted to spend \$200-\$300 million for the project. They tell us we are “already” paying for EE in our rates! If this project is stopped today—and they get 10% return for what they have spent already—that is not right. They should not be allowed a penny for their known negligence in attempting a false and unnecessary project for profit motive!

There should be NO PSE ENERGIZE EASTSIDE ALLOWED just to let a company profit at our expense, our safety and the neighborhood destruction of home values and trees.