

January 15, 2018

David Danner, Chairman  
Washington Utilities and Transportation Commission  
Olympia, WA

Docket: UE160918

Dear Chairman Danner:

I wish to comment on PSE's 2017 IRP regarding Montana Wind. Thank you for requiring PSE to review their 2015 IRP analysis regarding its viability to our energy requirements. I believe they made some helpful adjustments in the 2017 IRP, especially in the use of DNV GL performance data, but are still far short of a credible analysis.

To obtain what they describe as generic MT wind cost data they combined performance data from one location with transmission cost data from a very different and remote location resulting in exaggerated MT wind cost reported in 2017 IRP Figures 6-24, 6-47 and D-20. They chose performance data from a Martinsdale, MT site. The transmission cost data is from a proposed new transmission line connecting a proposed site in the Judith Gap area to the Broadview substation. Their estimated cost of this new line is \$52 M.

A more accurate approach would be to use transmission cost from the same Martinsdale site. The Montana Intertie transmission lines run directly through the Martinsdale area. The cost of a new substation at Martinsdale, required to connect to the Intertie, would be significantly less than the \$52M transmission line. More importantly, this approach would reduce the transmission distance by approximately 130 miles, reducing the associated line loss by about 50%, improving the overall performance and lowering overall cost significantly.

In a meeting with PSE on December 19, 2017 they confirmed the potential savings. They also agreed with me that, presently, a Montana wind component is the only way they could achieve an all-renewable portfolio as no other current new source would provide for the winter peak load requirement.

Many other sites along or near the MT Intertie line could be options to a Martinsdale site. Additionally, perhaps transformers and other equipment retired from the shutdown of Colstrip could be used in the substation to further reduce cost. This should be investigated.

I also suspect work on the other issues associated with developing a Montana wind resource are being prematurely dismissed because of the current exaggerated costs shown by PSE.

I urge the Commission to require PSE to revisit Montana wind again in the next IRP with a more rigorous method of determining MT wind cost.

Thank you,

Willard Westre  
15704 SE 44<sup>th</sup> St,  
Bellevue, WA  
Mechanical Engineer  
Ratepayer  
PSE IRP Advisory Group