

January 16, 2018

TO: Washington Utilities and Transportation Commission

FR: Margaret R. Moore, Bellevue Resident

RE: Docket numbers UE-160918 and UG-160919

I am specifically commenting on Chapter 8 of Puget Sound Energy's Integrated Resource Plan, title "Delivery Infrastructure Planning." PSE's Energize Eastside project currently under review by your Commission has become increasingly obsolete since it was first proposed 5 years ago and needs your careful consideration as to whether or not it should be allowed to continue in its present form.

I am offering comments regarding the project from several different perspectives: Demand Trends, Safety Implications, Technology Improvements, Environmental Impact, and PSE Profit Motives.

DEMAND TRENDS

PSE originally based its request for 18 miles of greatly expanded power lines through the eastside of Lake Washington communities on estimates of future power needs. Actual demand figures have been markedly less than originally estimated. So much so, that PSE has removed them from its website as no longer justifying its request. Parallel figures from Seattle City Light remain available and show regional demand falling based on improved technology and conservation measures. Lacking evidence of critical demand data from PSE, it would be highly egregious for PSE to be allowed to charge customers hundreds of millions of dollars for a project that is no longer needed in its present form.

While energy demand will probably rise on the Eastside over the next 50 years, there are other, better means of meeting this demand which are much less expensive, more in tune with future technological advances and far less damaging to the environment.

SAFETY IMPLICATIONS

For most of its proposed route, Energize Eastside would be constructed over the Olympic Pipeline, two aging 50-year-old lines which transport 13 million gallons of high-pressure jet fuel through the community daily to SeaTac Airport.

Two recent incidents illustrate what happens when a high-voltage transmission line comes into contact with an old petroleum pipeline. In 1999 Bellingham experienced such an incident costing the lives of 3 children. Locally, in May 2006 a fallen 115 KV line arced through the ground and into the buried pipeline. The damage was severe enough to cause the operator to shut down the 400-mile line for immediate repairs. The line that caused the danger is half the voltage of that being proposed by PSE.

California law prohibits such co-existence of fuel and high-voltage power lines within a much wider margin than is currently proposed by PSE – 600 feet to 1,500 feet.

In addition, the proposed joint utility corridor crosses the Seattle Fault Line which runs parallel to Interstate 90. This fault is estimated to potentially slip by more than 6 feet during the next big earthquake, likely rupturing the pipelines and downing power lines. Higher voltage transmission lines increase the risk of igniting a huge fire at the same time emergency responders are at a premium and roads are clogged or impassable.

TECHNOLOGY IMPROVEMENT

Since PSE first proposed Energize Eastside five years ago, energy technology has made astounding advances. Most important in these changes is the advent of powerful batteries that can store and release clean energy based upon demand. Three years ago PSE conducted an inconclusive battery study, but battery technology has vastly improved even in the short time since then. Tesla recently installed clean, economical battery clusters in both California and Australia which have advanced capacity, coupled with a cost much less per kilowatt than outmoded transmission lines.

In fact, the state of Washington has a manufacturer in Mukilteo, UniEnergy Technologies, which makes a battery that is completely non-flammable and long-lasting. It is important to note that PSE itself has determined that non-flammable flow batteries are even more economical than the lithium ion batteries used by Tesla. In the spirit of creating jobs in the region, let's see what our local company could do to provide clean, dependable energy for the Eastside far into the future. We urge the UTC, which is responsible for setting electricity rates that are fair for both customers and providers, to examine the fairness of allowing a utility to charge users exorbitant rates (with potential increases) when better, more economical alternatives are available.

ENVIRONMENTAL IMPACT

PSE has selected a corridor they believe offers the least controversial route through the community. However, what they propose to do through that corridor is obscene. Yes, there are small 115 KV lines through it now largely on short, wooden poles. What PSE proposes - and demonstrates in public meetings - is doubling both the height and elaborateness of the poles running through residential areas and scenic neighborhoods for 18 miles through the heart of Eastside communities.

In addition, PSE would have to cut down literally thousands of trees in order to be sure the new, imposing transmission lines would be unimpeded. The result would be a permanent scar through 29 neighborhoods in one of the most beautiful urban landscapes in the nation.

PSE PROFIT MOTIVE

PSE is no longer a Washington utility; it was purchased by a consortium of Australian and Canadian investors in 2009. This makes it much easier for it to look only at the profit potential rather than the impact its actions have on the community that must live with them.

Due to falling consumption and low natural gas prices, PSE's revenues have been declining – approximately 9% since 2011, according to statements filed with the Securities and Exchange Commission.

This fact makes infrastructure projects such as Energize Eastside the go-to remedy. This is enabled because PSE can collect an approximately 10% guaranteed return for infrastructure projects every year for decades. Those revenues are assured because they can be passed on to PSE's customers in the form of higher electricity bills. The cost of Energize Eastside for consumers will exceed one BILLION dollars over the lifetime of this proposed power line – estimated as \$200 million in cost plus \$800 million in interest.

The Northwest's regional power authority, Bonneville Power Administration, recently canceled a giant transmission line project in southwestern Washington, stating that better solutions for future power needs were available. Citing lower demand, smart technology and batteries, it noted that these now-available, cleaner options would provide the needed energy and save customers hundreds of millions of dollars.

I would also encourage the UTC to examine the outdated regulatory policies that guarantee such generous financial returns on transmission expenditures. If in fact the UTC is mandated to find a fair balance between utility company revenues and rates to customers, the current laws and the Energize Eastside proposal seem to have a thumb on the scale favoring the utilities.

The electric utility industry is experiencing a technology revolution, driven by renewable energy and battery storage. It is becoming glaringly obvious that an 18-mile outsized transmission line through handsome Eastside neighborhoods is a bad choice for the region's energy future. I encourage the Washington Utilities and Transportation Commission to exercise its vast influence and take a hard look at the viability – indeed the blind self-interest – of the proposed PSE Energize Eastside project. There is too much at stake to allow such an outmoded solution to a questionable problem go ahead - just because we have always done it that way.

Sincerely,

Margaret R. Moore
4707 135th PL SE
Bellevue, WA 98006
mmooreii@comcast.net

