

Responding to NOTICE OF REQUEST FOR COMMENTS dated November 29, 2017

RE: **Docket UE-171083** Coalition of Eastside Neighborhoods for Sensible Energy v. Puget Sound Energy,

Dear WUTC-

Your November 29, 2017 NOTICE OF REQUEST FOR COMMENTS in Docket No. UE-171083 did not specifically ask for a response from me. But I have closely monitored this Complaint proceeding and have responses that I believe will be useful to you in this matter. You may need to invoke your authorities under WAC 480-07-110 in order to accept these comments.

My specific comments are as follows:

- 1) Request: Comment on the extent to which the Commission has jurisdiction and authority to grant the relief requested in the Complaint.

Response: Clearly the Washington Administrative Code gives the Commission the jurisdiction and authority to grant the relief. One only need look as far as WAC 480-07-110 which states as follows:

WAC 480-07-110

Exemptions from and modifications to commission rules; conflicts with other rules.

*(1) **Exceptions and modifications.** The commission, in response to a request or on its own initiative, may grant an exemption from, or modify the application of, any of its rules in individual circumstances if the exemption or modification is consistent with the public interest, the purposes underlying regulation, and applicable statutes. Consistent with due process and the public interest, the commission may modify the application of procedural rules in this chapter on its own initiative during a particular adjudication or other docket without following the process identified in subsection (2) of this section.*

- 2) Request: Comment on the remedy the Commission could provide.

Response: There are at least two good remedies that the WUTC could provide:

- a) Order PSE to provide the requested data
- b) Advise PSE that PSE has not adequately studied the need for the Lake Hills-Phantom Lake Transmission line either in its IRP or elsewhere by not looking at the Distribution Automation solution. That being the case this Commission would deem it imprudent for purposes of rate recovery if PSE builds the line and asks for it to be included in ratebase in the future.

- 3) For completeness of the record, I also provide the following comment on the response that PSE sent to the CENSE consultant who would be performing the study of the Distribution Automation solution to increase the reliability in East Bellevue as an alternative to the imminent Lake Hills-Phantom Lake Transmission line. I have received a copy of that PSE response. In that response PSE states as follows:

“Options like distributed automation/FLISR or a 12.5 KV distribution loop would not address the need for a backup transmission line to the three substations.”

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I believe this statement is incorrect. Shortly after I received my Bachelor of Science in Electrical Engineering from Washington State University in the 1970's I went to work for Pacific Gas & Electric in their San Jose Division as a Distribution Engineer. One of my main tasks was to look at areas of the system where there were several substations served with short 115 KV radial transmission lines. Using spreadsheet analysis, I looked at the distribution line network that emanated from each of the substations to see if the distribution system would be able to keep customers in service if a radial transmission line to a substation failed. Data needed for the study was the rating of each of the substation transformers, the conductor size of the distribution lines that could connect to substations, and historic loading on each distribution line during system peak conditions. If we found a problem the fix was generally to beef up a distribution line. Not loop the 115 KV transmission.

Today there are more sophisticated tools to perform this analysis. CENSE has found a consultant that is well versed in these tools. But he needs data just like I needed data when I worked for Pacific Gas & Electric.

PSE may think that the 12.5 KV distribution loop would not address the need for a backup transmission line to the three substations, but they need to prove this statement is true by having the Distribution Automation study performed. Any confidential information the consultant would need to perform his study would be provided under a Non-Disclosure Agreement signed by the consultant. That is standard practice in the industry.

Thank you for your efforts in trying to make PSE perform appropriate analysis on solution to reliability problems that they may identify on their system.

A handwritten signature in cursive script that reads "Richard Lauckhart". The signature is written in black ink and is positioned above the typed name.

Richard Lauckhart
Energy Consultant
Davis, California

On behalf of concerned citizens in the East Bellevue area.