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| **From:** | Barbara Braun |
| **To:** | UTC DL Records Center |
| **Cc:** | jay; Rendahl, Ann (UTC); Danner, Dave (UTC); Barbara Braun |
| **Subject:** | 2017 IRP comments, Docket UE-160918 |
| **Date:** | Wednesday, January 17, 2018 6:28:33 AM |

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Commenting on: **Docket UE-160918 and UG-160919**
Comments by:

Barbara Braun
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Commenting on: **2017 IRP, Chapter 8, Delivery Infrastructure Planning, Energize Eastside (EE), pages 8-30 to 8-53**

Dear Commissioners,
I am writing to ask you to take proactive action on PSE's Energize Eastside project:

1. The IRP process is inadequate as it relates to Transmission Lines and Energize Eastside.
   - 1.1. WAC 480-100-238 "Integrated Resources Planning" says Transmission Line Planning is a requirement in the Integrated Resources Planning Process. It was not included in the 2015 IRP. After many conversations with the WUTC and PSE, PSE agreed to cover Transmission planning, including Energize Eastside, in the 2017 IRP. In fact throughout the 2017 process, PSE told us this would be done.
   - 1.2. The narrative that PSE has provided to date does not fulfill this requirement
   - 1.3. Chapter 8 was added so that Transmission Lines would be part of the IRP. After several months, PSE said they would add some information (Chapter 8) but would not fully discuss or analyze Transmission. PSE said a complete review of Transmission planning would be done in the 2019 IRP. Incidentally throughout the 2017 process, any time Energize Eastside was brought up questions they were immediately referred to the Energize Eastside team and webpage. PSE is now basically saying: "Well, we didn't have any requirement in the first place. But, since you asked for a narrative, we did provide it in Chapter 8 to meet our agreement with the WUTC. A full analysis of Transmission planning will be provided in 2019. And, oh, look at all the analysis that we did in the interim through our planning and EIS process. Obviously these activities fulfill, even exceed, any requirements upon us."
   - 1.4. The facts are that Chapter 8 was never reviewed by the Advisory Committee. There is no analysis within Chapter 8, simply a chronology and description of activities. PSE admits this upfront: This chapter is simply a description of planning using, conveniently so, Energize Eastside as an example. In other words, it is a descriptive narrative which was probably written by the EIS team.
   - 1.5. Since PSE has made this part of their 2017 IRP they need to present a complete and thorough analysis that includes the facts, data and calculations in the IRP. Without this the WUTC should reject this Chapter and the 2017 IRP because it does not meet RCW and WUTC requirements. I ask you for a separate Hearing on Energize Eastside and a supplemental to the 2017 IRP.
2. Energize Eastside is not prudent.
   - 2.1. The justification is woefully out of date. The solution proposed is technically obsolete, grossly expensive, very dangerous and environmentally unsound. It is the wrong "solution" for Washington and for PSE ratepayers.
   - 2.2. Technology and conservation are so impacting the demand curve that a current analysis including a complete load flow study and a current Eastside Customer Demand Forecast must be completed on Energize Eastside. This is the only way to protect ratepayers and fulfill prudency requirements. Without this, EE is not prudent.
   - 2.3. Given the lifespan of the Energize Eastside project, and the great cost of the project to the

rate payers, it is prudent to insure the most advanced, safest and cheapest solutions are implemented. It is irresponsible to say that because this project was proposed years ago, we are justified in implementing an expensive albatross of a solution. This is not prudent.

2.4. The WUTC must require this to fulfill its duty to protect the rate payers. The WUTC must indicate the current EE configuration will not be approved for rate increases.

In conclusion, the proposed project uses outdated technology to solve an unsubstantiated problem. I am asking the WUTC to reject this IRP until that analysis is done. I ask you for a separate Hearing on Energize Eastside and a supplemental to the 2017 IRP.