

January 15, 2018

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergree Park Drive S. W.
Olympia, Washington 98505-7250

Re: Puget Sound Energy – 2017 Integrated Resources Plan Docket UE -160918. Rejection of plan due to failure to meet RCW WAC 480-100-132 requirements; Request for supplemental information to fulfill requirements and scheduling of Public Hearing concerning “Energize Eastside” proposal.

Dear Executive Director and Commissioners:

My name is Warren Halverson. I am a retired executive from U. S. West (now Century Link); President of the Canter Green HOA in Bellevue’s Bridle Trails neighborhood, Board Member of CENSE and a 45 year ratepayer of Puget Sound Energy.

Over the last four years I have become very involved in electrical reliability issues through involvement with the Bridle Trails Association, the City of Bellevue and the Coalition of Eastside Neighborhoods for Sensible Energy. During this time, I have actively participated with written and oral testimony at Puget Sound Energy’s Community Action Group meetings, PSE’s Energize Eastside forums, PSE/ City of Bellevue’s EIS meetings, various electrical energy forums and PSE’s 2015 and 2017 Integrated Resources Planning forums, Advisory Group meetings and processes.

Based upon these personal involvements and analysis of factual information provided in Attachment 1, 2 & 3, it is “our” conclusion that PSE’s 2017 IRP miserably fails to address or to provide detail for at least five requirements in RCW WAC 480-100-238. Integrated Resource Planning. (Listed below I reference WAC requirements using parans ().)

1. It fails to provide detail concerning “transmission capability requirements” (3)(d).
2. It fails to provide in Chapter 8: System Planning, for the project Energize Eastside “an assessment of transmission capability and reliability” and meaningful planning, analysis and detail (3)(d).
3. It fails to provide adequate detail and analysis concerning electrical demand, Chapter 5 (3)(a), 3(b), 3(c).

4. It fails to be transparent and open with the IRP Advisory Group in pursuing answers to ongoing questions and requests for further detail (5).
5. It fails to assess market environment, modern technology and alternative solutions in even the broadest sense. This assessment is necessary to satisfy ratepayers and PSE's objective of providing reliable energy in a cost effective manner. This assessment is necessary for the WUTC to meet prudence tests and ultimately rate hearing determinations. It fails 2(b); 3(e); 3(f) in RCW WAC 480-100-238.

Clearly, the WUTC does not manage PSE nor does it manage its projects. However, the WUTC is empowered with the most significant oversight role of any public agency. Being a business person, I truly appreciate the significant responsibility of providing reliable power at a reasonable cost. However, Puget Sound Energy has an exclusive franchise. PSE is a monopoly, a monopoly with unlimited power, foreign ownership and a guaranteed rate of return to shareholders. The WUTC guarantees this rate of return. In effect, the WUTC is the "invisible hand" in our economic system. Thus, your role in protecting the public is both essential and appreciated.

Today, the public has asked - literally cried out - to have an impartial review of PSE's proposed "Energize Eastside". This outcry has occurred only after every human effort possible has failed to get answers to questions. This project, conceived in 1993, – 24 years ago – will leave scars in our neighborhoods for the next 40 years and beyond. Energize Eastside is so large, costing ratepayers \$250, 000, 0000 to upwards of \$1,000,000, 0000 over the life of the project; so controversial in light of rapidly declining electrical demand, so outdated in terms of technology and cross elasticity between transmission and production ; so environmentally devastating and so unsafe considering proximity to Olympic pipeline and adjoining family residences that no company should be able to build this without strong community scrutiny and tough regulatory oversight. Providing little or no regulatory oversight prior to its construction is simply unsatisfactory.

Chapter 8: "System Planning" seems to be a narrative description of Energize Eastside. It is based upon a biased Environmental Impact Statement. This is inappropriate and incomplete for an IRP evaluation. It seems that this chapter violates the intent of WAC 480-100-132 and falls short if the purpose here is to justify the project.

P. 3 W. E. Halveson PSE 2017 IRP Testimony UE – 160918 (Jan 15, 2018)

We therefore request the WUTC fulfill its responsibility by requiring PSE to fulfill its responsibility to provide:

1. Current Load Flow Studies for all transmission and distribution lines located in the Eastside of King County. Special emphasis should be placed on the current 115KV line which PSE proposes to replace with a 230KV transmission line. PSE has often asserted that these lines are outdated and overloaded. Only with current Load Flow studies can demand and reliability be accurately determined.
2. Current “Eastside Customer Demand Forecasts” with assumptions, actual and forecasted numbers. For IRP continuity and understanding, this should include a comparison to the previous 2013 and 2015 forecasts.
3. Alternative Solutions to an overhead 230KV transmission line. Only with a current load flow study and a local forecast can PSE justify a solution that meets their responsibility to provide reliable electrical energy and do it for consumers in a cost effective way. You too share with them social responsibility for the safety of our citizens and the protection of our environment.

In conclusion, we request the WUTC (1) reject PSE’s 2017 IRP submittal until these requirements are fulfilled in a complete rewrite or an addendum; (2) hold a formal hearing on the project “Energize Eastside” for public testimony and submission of expert analysis and testimony as was done in the 2017 IRP Advisory Group meetings for other projects.

We would appreciate a formal reply to this request. Thank you for your consideration.

Sincerely and on behalf of the ratepayer public,


Warren E. Halveson

cc Commissioners Danner, Rendahl and Balasbas

Attachment #1: W. E. Halveson letter to the WUTC, “PSEs 2017 Integrated Resource Plan Chapter #5: Demand; Chapter #8: System Planning”; January 15, 2017.

Attachment #2: W. E. Halveson letter to IRP Advisory Group, “Energize Eastside: Advisory Group Concerns”; September 25, 2017. (PSE did not reply to this letter or questions herein).