

**My name is Richard Lauckhart**

I am an Energy Consultant for CENSE and a past VP of Power Planning for Puget

Comments made by me at the June 26, 2023 WUTC Zoom meeting re PSE IRP Docket UE-200304

I make 9 points in these comments as follows:

Received  
Records Management  
Jun 26, 2023

- 1) *The WUTC has made it clear that major transmission lines need to be addressed in the IRP. For unknown reasons, PSE continues to avoid doing that. They have avoided doing it again in Docket UE-200304*
- 2) *In Docket No. UE-220066, CENSE has testified that the Energize Eastside (EE) project is not a prudent investment because PSE has failed to meet each of the four factors historically used in determining prudence. The WUTC has put off that decision until sometime in the unknowable future when the line is built and used and useful.*
- 3) *In Docket no. UE-220066, CENSE has testified that Energize Eastside should be found to be imprudent based on safety alone. No one from Olympic Pipeline has ever testified that the colocation of EE and the Olympic fuel pipeline is safe. PSE has never identified the location of the towers/lines. The Commission seems to want to wait until the line is built to find the location of the towers and lines. By that time, the locations of the lines and towers will be known and we will know (a) where PSE was able to locate the much higher voltage lines on the right of way in comparison to the location of the Olympic pipelines and, (b) whether in order to comply with **safety regulations**, these pole locations required getting variances from homeowners along the route to the Easements these homeowners have regarding the existing right-of-way.*
- 4) *In Docket No. UE-220066 PSE finally provided CENSE the input and output of their load flow studies they ran in 2013 and 2015. But the Commission ruled it was too late to get my review of these data files on the record in UE-220066. So, I have submitted my findings on the 2013 and 2015 input and output studies in this IRP proceeding. I found that the PSE/Quanta studies contained a **shocking manipulation of the input data**. I will use what I learned from that review in the future hearing on the Prudency of Energize Eastside. **See attached document describing the problems I found when doing my autopsy of the load flow studies PSE ran in 2013 and 2015.***
- 5) *FERC has made it clear in FERC Docket No. EL23-23 that FERC has never examined the need for Energize Eastside and never stated that Energize Eastside was needed.*
- 6) *The FERC Order in FERC Docket No. EL23-23 makes it clear that CENSE has never had an opportunity to participate in an open and transparent Stakeholder process regarding the need for Energize Eastside.*

7) The FERC Order in FERC Docket No. EL23-23 makes it clear that CENSE has never been provided a copy of any PSE Planning Assessment or TPL-001 reports. It is in the Public Interest that these documents are made to CENSE before there is any finding of Prudency of Energize Eastside. **The Commission should demand that PSE provide these documents to interested and affected parties.**

8) CENSE/Lauckhart have submitted a very large number of documents in this proceeding UE-200304. As these documents demonstrate, Energize Eastside is not Prudent.

9) **These documents make it clear that as of December 27, 2023 (if not earlier) any PSE Board decision to spend money on Energize Eastside is imprudent.**

## Attachment

Results of Lauckhart autopsy of the PSE/Quanta load flow modeling data.

**Re: Performing my autopsy of your case data files...**

Richard Lauckhart &lt;lauckjr@hotmail.com&gt;

Tue 9/27/2022 12:15 PM

To: Ciarabellini, Jeremy - Transmission <Jeremy.Ciarabellini@pse.com>; Imamovic, Stephanie - Transmission <Stephanie.Imamovic@pse.com>; Green, Brandon - Transmission <Brandon.Green@pse.com>; Gard, Sylvia - Transmission <Sylvia.Gard@pse.com>; Ewry, Eleanor - Transmission <Eleanor.Ewry@pse.com>; Nedrud, Jens - Transmission <jens.nedrud@pse.com>  
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Jeremy-

I have done more research on the files you sent. Additional findings are:

1) Your Base Case (Case 1) has overloads in it without any contingencies. That is because Case 1 also has (a) 1500 MW of NW Washington generation turned off in a Heavy winter conditions, (2) 1,500 MW moving to Canada, and (c) the I-5 Corridor Reinforcement Project in service. There are all three fatal flaws. Overloads appear on the existing 115 KV lines in and out of Lakeside. There should be no overloads in a (N-0) case.

2) Your Case 9 then takes out two elements of the grid on N-1-1. These elements appear to be (a) one 230 KV line section from Maple Valley to Klahanie and (b) the 500 KV line from Maple Valley to Echo Lake.

If you disagree with these findings, please explain what I have wrong.

Richard Lauckhart  
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