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**Subject:** CSEE submission re PSE IRP, Docket UE-160918  
**Date:** Monday, February 5, 2018 3:39:15 PM  
**Attachments:** [CSEE re PSE IRP - 2-5-2018.pdf](#)  
[BPA FOIA response 2015.pdf](#)

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To: The WUTC, Docket UE-160918

Please include for the record in this docket the attached two documents in PDF format, consisting of my letter of today's date and the other document referenced in my letter.

Thank you for your assistance.

Larry G. Johnson  
Attorney at Law, WSBA #5682  
Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)  
8505 129th Ave. SE  
Newcastle, WA 98056  
tel.: 425 227-3352

# Citizens for Sane Eastside Energy (CSEE)

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February 5, 2018

To: The Washington Utilities and Transportation Commission

Docket UE-160918

[submitted by email to records@utc.wa.gov](mailto:records@utc.wa.gov)

Re: Inadequacies in PSE's IRP include several misrepresentations regarding Energize Eastside

Dear Honorable Commissioners:

Citizens for Sane Eastside Energy (CSEE) is an Eastside citizens action group. This letter supplements our earlier letter to you of January 18, 2018, and addresses the following issues of continuing concern regarding PSE's insufficient and inadequate IRP as to three (of many) topics about which PSE has consistently lied to the UTC and the public:

## 1. "1,500 MW to Canada"

**Energize Eastside (EE) is an old, dusted-off project** whose primary intent was to meet a perceived need in 2003 for delivery of more power to Canada, in an area technically called the Northern Intertie at the Canadian border. BPA led this charge, concerned that up to 1,500 MW of power might be needed to send to Canada under a treaty with the United States. 1,500 MW is a lot of power, about what the city of Seattle consumes daily under normal conditions.

This 2003-inaugurated project was called Snohomish-Lakeside-Talbot. "Energize Eastside" is still called Snohomish-Lakeside-Talbot by ColumbiaGrid, the regional entity that PSE belongs to. Yet without disclosing the historical origins of EE, PSE dusted it off in 2014 and claimed it was a "new" project for local load only. Nevertheless, PSE kept in EE the supposed need to supply Canada with 1,500 MW from the old project (*1,500 MW that can never be delivered, anyway* — see Section 2 below), and used that as a factor in PSE-sponsored load flow studies to justify EE. USE, an independent consultant hired by the City of Bellevue, assumed PSE's 1,500 MW assumption was correct and erroneously adopted it without question.

Without that 1,500 MW factored into the computer simulation for an extreme cold day — an event that would stress system reliability — we now know there is no need for EE. The Lauckhart-Schiffman load flow studies prove that, and these are the only load flow studies ever done that are totally transparent. PSE has steadfastly refused to fully disclose the key data it used in its studies,<sup>1</sup> though we know it had to have relied on these bogus 1,500 MW to make its

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<sup>1</sup> Even though FERC has stated that our expert, Richard Lauckhart, is CEII-cleared and entitled to *all* the data in the PSE-sponsored load flow studies. This stonewalling by PSE violates NERC/FERC Reliability Requirement TPL-001-4 which mandates that PSE conduct Planning Assessment in an "open and transparent stakeholder process."

studies come out the way they wanted.<sup>2</sup>

PSE claims there is a “firm commitment” for PSE to deliver those 1,500 MW, though BPA in a reply to my FOIA request states that no such firm commitment exists.<sup>3</sup> And clearly, neither PSE nor its customers are required to pay for local transmission sufficient to deliver 1,500 MW to Canada.<sup>4</sup>

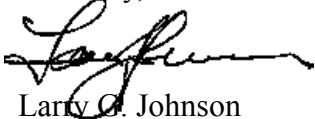
## **2. Voltage collapse**

**ANY such 1,500 MW “commitment” is impossible to meet, anyway.** Why? Because there would not be transmission capability over the Cascades to deliver the needed amount of power to meet Puget Sound Area peak load and deliver this 1,500 MW to Canada. If PSE ever were to try to send 1,500 MW to Canada, or even significantly lesser amounts, there would be a **voltage collapse as a result**. To prevent appliances and motors from being fried due to low voltages, there would have to be a massive power shutdown in Western Washington in such an event. In other words, a blackout. PSE’s load flow studies must surely have shown them that, and that is almost certainly the reason why they won’t show their homework.

## **3. No Eastside “backbone”, but rather a 115 kV network that needs no upgrading**

**PSE’s PR about the “backbone” of the grid on the Eastside having not been upgraded since the 1960s is not true.** Starting as early as 1992, PSE considered upgrading the Lakeside transformer and feeding it with 230kV lines to replace the existing 115kV lines as contemplated by EE. Instead, over the years PSE has built a number of new 115kV lines to meet energy demand increases in the 1990s and into the early 2000s. **What we have on the Eastside is a 115kV network, not a single backbone.** See the attached graphic prepared by former Puget Power VP for Power Planning, Richard Lauckhart, that shows this 115kV network. This system needs no further “upgrading.”

Sincerely,



Larry O. Johnson

Attorney at Law, WSBA #5682

Citizens for Sane Eastside Energy (CSEE), [www.sane-eastside-energy.com](http://www.sane-eastside-energy.com)

8505 129th Ave. SE, Newcastle, WA 98056

tel.: 425 227-3352

cc: IRP Advisory Group members; CENSE; City Councils of Bellevue, Newcastle and Renton

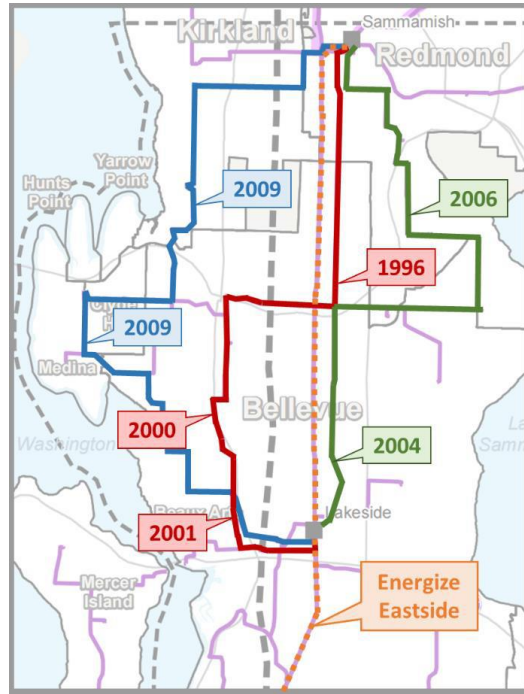
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<sup>2</sup> PSE claims it is constrained to design Energize Eastside to an extreme because of “federal regulations,” even though those regulations require maintaining reliability only as far as an N-2 event. In adding the bogus 1,500 MW to Canada *and turning off 10 peaker plants in Western Washington specifically built to meet high peak demand*, PSE-sponsored and the USE load flow studies simulate a phantasmagorical N-8 event in order only then to demonstrate a “need” for the project.

<sup>3</sup> See attached letter to me from the BPA dated July 27, 2015, especially the highlighted last paragraph on page 2. PSE admits it would have to redo its load flow studies if there is indeed no such commitment: see video at <https://youtu.be/UixzxxOmPic>. Yet it has not done so to date.

<sup>4</sup> PSE signed a Memorandum of Understanding with the BPA and Seattle City Light in 2012 whereby the latter two agreed to help pay for the cost of Energize Eastside. That agreement is still in effect, thus begging the question: How could this agreement have occurred if EE is “entirely local.”

New 115 KV lines built in the eastside in recent years...  
no longer a “backbone”, now a “network”!





## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

FREEDOM OF INFORMATION ACT PROGRAM

July 27, 2015

In reply refer to: FOIA BPA 2015-01500-F

Larry G. Johnson  
Attorney at Law  
8505 129th Ave SE  
Newcastle, WA 98056

Mr. Johnson:

This communication is a final response to your request to the Bonneville Power Administration (BPA) for records under the Freedom of Information Act (FOIA), (5 U.S.C. § 552). Your request was received on June 17, 2015, and clarified on June 28, 2015, and superseded on June 30, 2015.

### **Your Initial Request:**

“...all documents, electronic or otherwise, draft and final, including e-mail correspondence, presentations, correspondence, draft agreements and notes, related to the following:

- 1) As to the "U.S. Entity" as defined in the Columbia River Treaty of 1964, and as amended in 1998, please copy and produce any and all documents, including electronic documents in native file format, which either discuss or relate to the U.S. Entity's requesting Firm Transmission of Canada's entitlement to that Columbia River Treaty power by delivering it to Canada on the BPA transmission system.
- 2) If such a request was made as identified in para. 1 above, please provide copies of any and all reports done of the analyses performed to determine if BPA could honor the request for Firm Transmission service.
- 3) Please provide any and all Firm Transmission Contracts under which the BPA Transmission business line agreed to provide Firm Transmission to Canada for the U.S. Entity under the Canadian Treaty, ~~or under any other arrangement or contract by or for BPA for any purpose~~ [strikeout made after clarification with requester on June 28, 2015].

Please consider the relevant time period for these requests to be from 1998 to the present.”



**Your Successive and Superseding Request:**

“...any documents that would show what is called a “firm transmission” agreement regarding delivery of any electricity to Canada to which Canada is entitled under the Columbia River Treaty between the United States and Canada. ... use[ing] ... the OASIS web site [to] retrieve information that will identify whether such firm transmission agreements were ever sought or agreed to...”

You further requested that the following six successive steps be executed:

- “1) First look at the BPA transmission service request queue that should be available on BPA’s OASIS web site.
- 2) Look through that listing of transmission service requests to see which, if any, of the requests in that queue were made by the US entity on the Treaty with a point of delivery to be made where the BPA transmission lines connect with BC Hydro transmission lines. This search should take less than an hour.
- 3) If it is found that one of the items in that transmission request queue were from the US Entity to deliver treaty power to Canada, then see if the queue indicates a System Impact Study (and possibly also a Facilities Study) was done with respect to that request. The queue should have an indication if one or both of these was/were done.
- 4) If the queue indicates a System Impact Study was done, then there is likely a link to the queue where that study can be found. It can be downloaded and readily emailed to me.
- 5) If the queue indicates a Facilities Study was done, then there is likely a link to the queue where that study can be found. It can be downloaded and readily emailed to me.
- 6) If the queue indicates that a Transmission Contract was ultimately signed as a result of the request, then there should be a link to the queue where that Transmission Contract can be found. It can be downloaded and readily emailed to me.

If this process is agreeable to you and you produce any relevant documents found as a result (or report back that no such documents were found), that should conclude this matter.”

**Response:**

BPA’s Public Utilities Specialists (Reservationist and Project Manager), in coordination with BPA staff in Transmission Policy & Strategy, Long Term Sales & Purchases, and Regional Coordination have performed the requested records search steps in BPA’s OASIS database, as you requested and enumerated to BPA’s FOIA staff. No responsive records were found as a result of that search.

**Fees:**

There are no fees associated with this request.

**Appeal:**

You may seek administrative appeal pursuant to Department of Energy FOIA regulations at 10 C.F.R. § 1004.8. If you choose to appeal, you must do so in writing within 30 days, and include the following information:

- (1) The nature of your appeal - denial of records, partial denial of records, lack of responsive records, or denial of fee waiver;
- (2) Any legal authorities relied upon to support the appeal; and
- (3) A copy of this determination letter.

Clearly mark both your letter and envelope with the words "FOIA Appeal," and direct it to the following address:

Director, Office of Hearings and Appeals  
Department of Energy  
1000 Independence Avenue SW  
Washington DC 20585-1615

If you have any questions about this letter, please contact James King (CorSource Technology Group, Inc.) assigned to Bonneville Power Administration, at 503-230-7621.

Sincerely,



C. M. Frost  
Freedom of Information/Privacy Act Officer