

## **Evidence that ColumbiaGrid had no substantive role in determining the need for Energize Eastside**

ColumbiaGrid actions indicate that PSE/Quanta did not do correct studies

The following facts are relevant to the question of whether or not there is any proof of the need for Energize eastside:

1. ColumbiaGrid has not performed any analysis that demonstrates the need for Energize Eastside. FERC has stated that since PSE did not request that Energize Eastside be a part of a regional plan that ColumbiaGrid had no obligation to perform load flow studies on the need for ColumbiaGrid in an Open and Transparent fashion with stakeholder input. When specifically asked last month if the need for Energize Eastside was studied by ColumbiaGrid, ColumbiaGrid refused to answer saying that FERC had ruled on that question in the FERC Order by pointing out that PSE had not requested that Energize Eastside be a part of a regional plan.
2. PSE has stated that ColumbiaGrid requires PSE to include a delivery of 1,350 MW of Entitlement Power to the Canadian border when PSE studies the local area transmission needs on the PSE system.<sup>1</sup> But when ColumbiaGrid was asked to provide proof that there is a Firm Commitment by BPA (or anyone else in the United States) to have Entitlement Power delivered to the Canadian border, ColumbiaGrid did not provide such proof. And when ColumbiaGrid was provided clear evidence in Treaty Documents that there is no Firm Commitment by BPA (or anyone else in the United States) to deliver Entitlement Power to the Canadian border, ColumbiaGrid declined to attempt to contradict this evidence.
3. When ColumbiaGrid does its studies of the adequacy of the transmission grid during winter peak events, ColumbiaGrid assumes that 1,680 MW of PSE owned/controlled Puget Sound Area generation is running. This is the standard method to study heavy winter conditions in the Northwest because the Northwest is a winter peaking region. PSE cannot meet its winter system peak load without all this generation running. But when PSE/Quanta ran load flow studies in the Eastside Needs Assessment, PSE only ran 259 MW of this 1,680 MW of generation. ColumbiaGrid was asked if there would be a reasonable explanation for PSE making its assumption and ColumbiaGrid had no response.
4. If PSE would have requested that Energize Eastside be a part of a regional plan, then ColumbiaGrid would not only have made load flow runs [on the need for Energize Eastside in an Open and Transparent fashion with stakeholder input], but also the FERC required cost allocation activity would have required that ColumbiaGrid do analysis to see which entities in ColumbiaGrid would pay what part of the Energize Eastside project. If Energize Eastside was being built in part to help BPA increase its ability to deliver Canadian Entitlement power to the Canadian border, then the FERC/ColumbiaGrid required cost allocation analysis would have had

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<sup>1</sup> The Booga Gilbertson March 23, 2016 letter provided to the IRPAG group by Jens Nedrud on May 4, 2017 states in part "Flows to and from Canada are set by the regional planning authority (ColumbiaGrid) in conjunction with other regional utilities.....This is the modeling requirement – a requirement that is spelled out quite clearly in ColumbiaGrid's Biennial reports." The Booga Gilbertson letter was rebutted shortly after she sent it in 2016.

BPA pay the lion share of the cost of Energize Eastside. But ColumbiaGrid did not perform those studies. Instead, in a set of separate negotiations, PSE agreed that BPA would contribute nothing to the cost of Energize Eastside.

**In summary,** ColumbiaGrid had no substantive role in determining the need for Energize Eastside. The PSE/Quanta approach to evaluating the adequacy of the transmission grid does not follow the ColumbiaGrid and industry standard of running all Puget Sound Area generation during a winter heavy load event. If ColumbiaGrid told PSE that ColumbiaGrid requires PSE to include a delivery of 1,350 MW of Entitlement Power to the Canadian border, as stated in the footnote 1 referenced Booga Gilbertson letter, then ColumbiaGrid was wrong in saying that. And ColumbiaGrid was not being consistent with the fact that PSE had not requested that Energize Eastside be a part of a regional plan. Further, ColumbiaGrid did not perform the cost allocation studies it would have needed to provide if ColumbiaGrid had played a substantive role in determining the need for Energize Eastside.

The PSE/Quanta Eastside Needs Assessment load flow studies incorrectly included a requirement to deliver 1,350 MW of Entitlement Power to the Canadian border and incorrectly shut down 1,421 MW of PSE's Puget Sound Area generation. These assumptions alone demonstrate that the load flow studies done by PSE/Quanta were done incorrectly. There is also evidence that other input assumptions used by PSE/Quanta were likely not correct, but PSE refuses to show the data it used in the PSE/Quanta load flow studies. Load flow studies correcting the problematic PSE/Quanta assumptions demonstrate that Energize Eastside is not needed.

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On behalf of a large number of citizens concerned about transmission plans in the Puget Sound Area