

May 11, 2017

Heidi Bedwell
City of Bellevue Development Services Department
450 110th Avenue NE
Bellevue, WA 98004

Re: Comment for Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell:

I am writing to submit comment on the Energize Eastside Phase 2 Draft EIS.

This comment relates to pages 2-52 of the Phase 2 Draft EIS. In particular section 2.2.1 "Seattle City Light Transmission Line" option.

In order to understand how this option works, one needs to be familiar with FERC's ProForma Open Access Transmission Tariff (OATT). The FERC ProForma Open Access Transmission Tariff can be found at:

<https://www.ferc.gov/industries/electric/indus-act/oatt-reform/order-890-B/pro-forma-open-access.pdf>

Section 6 of the OATT discusses "Reciprocity". If SCL uses the lines of one or more FERC directly regulated utilities, then SCL will have agreed to these terms when they use those lines. Meaning under reciprocity, SCL agrees to also deal with requests for use of their transmission grid under the FERC OATT approach.

Other sections of interest to this SCL Transmission Line option are:

Section 15. Service Availability

Section 16. Transmission Customer Responsibility

Section 17. Procedures for arranging for Firm Point to Point transmission service

*[This section is particularly relevant to how PSE needs to ask SCL for use of its line to serve a new 230/115 KV transformer at Lakeside. **There is a requirement to make a formal application in the format that is described in the OATT. PSE has never made such an application. An informal request does not meet the required format for making a request to use the SCL line. PSE needs to make this formal request to SCL.**]*

Section 19. Additional studies procedures for Firm Transmission

With an understanding of how FERC's OATT works, it is clear that just about every sentence in the discussion of the SCL option is incorrect, meaning these sentences are not consistent with the OATT.

First sentence:

"SCL has indicated to the City of Bellevue that they expect to need the corridor for their own purposes and are not interested in sharing the corridor with PSE (SCL, 2014)."

The EIS staff should already be aware that FERC does not allow a utility like SCL to "hoard" its transmission capability. Further, the FERC OATT requires a utility like SCL to increase the rating of its infrastructure (with needed construction) if that is what it takes to honor a request for transmission and the requesting utility agrees to pay what FERC requires them to pay. No one has performed a System Impact Study (as required by the OATT) to see what it would take to honor a PSE request to use the SCL line to serve a new 230/115 KV transformer at Lakeside.

Second sentence:

"The existing SCL line would have to be rebuilt to provide a feasible solution for the Energize Eastside project, because the current rating of the SCL line is insufficient to meet PSE's needs (Strauch, personal communication, 2015)."

If it can be shown that the existing SCL line would need to be rebuilt to provide a feasible solution for the Energize Eastside project, then that is what the FERC OATT would require be done as long as PSE agrees to pay what FERC would require them to pay for that construction. Until a study is done, one cannot tell for sure what the rebuild cost would be. But it certainly would be less than the cost of Energize Eastside. Further, it should be clear that the request to use the SCL line is only for purposes of serving a new 230/115 KV transformer at Lakeside. The study to determine what this cost must not include a requirement to deliver 1,500 MW to Canada unless BPA makes that request and BPA would pay the bulk of the needed cost if the SCL line is also being used to increase the ability of BPA to deliver power to Canada.

Third Sentence:

"PSE has estimated that rebuilding the SCL line would provide sufficient capacity for a period of less than 10 years, which does not comply with PSE's electrical criteria (as described in Section 2.2.1 of the Phase 1 Draft EIS) to meet performance criteria for 10 years or more after construction."

Under the FERC OATT rules that SCL needs to comply with, SCL does not get to stop serving Lakeside after ten years even if SCL has a legitimate need for more use of its SCL line at that time. The FERC OATT has clear rules on how a utility like PSE can assure its transmission service from SCL can be retained even after SCL decides it needs the line for its own use. The FERC OATT protects a utility like PSE from SCL stopping to provide them transmission service.

Fourth Sentence:

"Neither the City nor PSE can compel SCL to allow the use of this corridor; therefore, this option is not feasible and was not carried forward."

This statement is wrong. PSE can compel SCL to use its line to serve a new 230/115 KV transformer by making a FERC Order 888 request (under the FERC OATT) for such transmission service. If SCL refuses, FERC will compel them to do so. FERC uses its "reciprocity" ruling to compel SCL. If SCL refuses, FERC will refuse to let SCL use any transmission lines that are under direct FERC jurisdiction. SCL could not meaningfully its service obligations to its own customers without using the transmission lines of FERC directly jurisdictional utilities.

Fifth Sentence:

"Even if compelled use of the corridor were allowed, the negotiations would likely prove lengthy, and would likely preclude completion of the project within the required timeline to meet project objectives."

The FERC OATT has tight timelines for dealing with requests for transmission service. FERC intentionally put in these tight timelines to prohibit a utility like SCL from denying service by delaying service. Further, PSE currently is not saying when it thinks it needs a new 230/115 KV transformer to be in service at Lakeside. Any needed construction on the existing SCL line will take considerably less time than permitting and building EE. Further, according to the only reasonable load flow study done regarding serving the east side (the Lauckhart-Schiffman Load Flow study), there is plenty of time before any new 230/115 KV transformer is needed at Lakeside.

Thank you for the opportunity to clarify how this SCL Transmission Line option would work.

Sincerely,

A handwritten signature in black ink that reads "Richard Lauckhart". The signature is written in a cursive, flowing style.

Richard Lauckhart
Energy Consultant
Davis, California
530-759-9390
lauckjr@hotmail.com