

From: [Richard Lauckhart](#)
To: [UTC DL Records Center](#); [Danner, Dave \(UTC\)](#); [Rendahl, Ann \(UTC\)](#); [Balasbas, Jay \(UTC\)](#)
Subject: Informal Submission in Docket U-180680 re: IRP not dealing with Transmission Planning
Date: Tuesday, December 18, 2018 8:47:25 AM
Attachments: [Failure to examine need for Energize Eastside in IRP.pdf](#)

Records and WUTC Commissioners-

Please file this email and its attachment in Docket U-180680 as an Informal Submission per WAC 480-07-140 (1)(a).

In denying my request to be a formal party in this proceeding, the Commissioners stated they will consider making some or all of the proposed conditions I believe the WUTC should make on the new foreign ownership group. The Commission also stated that an alternative would be for me to bring my concerns about PSE abusing the transmission planning process up in the PSE IRP. I have already done that once and the Commission did not require PSE to fix their last IRP. The Commission seems to be of the opinion that if this matter is brought up in the next IRP then it will receive appropriate treatment. But that is not happening.

Clearly PSE is refusing to address these matters in their current IRP. Attached is a copy of an email that Don Marsh of CENSE has sent to all Technical Advisory Group members in the current IRP. As you can see, PSE and its foreign owners are once again refusing to study the need for Energize Eastside in an Open and Transparent fashion.

This is more evidence that the Commission needs to place some or all of the seven conditions I propose in any approval they give to the Joint Applicants in Docket U-180680.

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UTILITY AND TRANSP.
COMMISSION
12/18/18 09:21
Received
Records Management

From: Don Marsh <donmarsh@cense.org>

Sent: Tuesday, December 18, 2018 6:27 AM

To: 'IRP -- mail --' <IRP@pse.com>; 'Popoff, Phillip' <phillip.popoff@pse.com>; 'Netik, Irena' <irena.netik@pse.com>; 'Kvam, Michele' <michele.kvam@pse.com>

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Subject: TAG discussion of Energize Eastside

Dear TAG members,

At the last TAG meeting, CENSE representatives asked when the TAG would discuss PSE's "Energize Eastside" transmission project. Many people have told us that this project should be discussed in IRP advisory meetings, despite PSE's reluctance.

CENSE believes consideration by the TAG is appropriate for the following reasons:

1. Washington Administrative Code 480-100-238.3.d states that the IRP should include, at a minimum, **"An assessment of transmission system capability and reliability, to the extent such information can be provided consistent with applicable laws."**

2. In its response to the 2017 IRP, the WUTC elaborated: **“The Company has an obligation to bring major transmission investments into the IRP for examination.”** Note that Energize Eastside is slated to cost ratepayers \$200-\$300 million, a significant investment.
3. No discussion has occurred in either the IRP Advisory Group or the TAG regarding cost-effective alternatives that could address peak demand reliability issues. For example, some combination of demand response, electrical efficiency, distributed generation, and energy storage would provide reliability benefits, lower cost, and reduced greenhouse gases.
4. On May 7, 2018, the WUTC listed a number of questions the Commission has about the Energize Eastside project regarding 1) Canadian Entitlements; 2) need for Energize Eastside; 3) five thermal generation facilities that are assumed to be offline during a peak load scenario; 4) lack of response to individuals who obtained CEII clearance from FERC; 5) peak load forecasts; 6) a joint utility analysis to serve regional reliability issues. **PSE has not publicly responded to these questions.**
5. On July 13, 2018, PSE filed its 2019 IRP work plan with the WUTC, including an IRP meeting specifically dedicated to Transmission and Distribution Planning on November 23, 2018. **This meeting was never held.**
6. On November 16, 2018 (WUTC Docket U-180680 – Transfer of Ownership), Sheree Carson and Jennifer Cemerón-Rulkowski, lead lawyers for PSE and the WUTC respectively, rejected expert testimony from former PSE vice-president Rich Lauckhart concerning transmission infrastructure. The lawyers agreed that these issues were **“more appropriately discussed in the IRP process and/or rate case testimony.”**

At the TAG meeting, Phillip Popoff, PSE’s Manager of Resource Planning, said Energize Eastside is a local transmission project that is outside the scope of the “system-wide” IRP planning process. However, PSE has included enormous transfers of electricity to Canada (1,500 MW) and California (2,850 MW) in its “key assumptions” that justify the project

(see https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf

, pages 7-8). If a transmission upgrade is needed to sustain these regional flows at maximum rated capacity during an N-1-1 outage on the Eastside, then the project is not just a local transmission line. It is a “major transmission investment” that should be discussed in IRP meetings.

We ask TAG members to support our call for PSE to provide technical justification for this project at the TAG. We would also like the TAG to consider alternatives that may be more cost effective for ratepayers and beneficial for the environment. The TAG can more easily understand the technical issues and trade-offs than local council members and land use judges who lack the necessary technical background.

There is some urgency, since public hearings on Energize Eastside may happen in late January.

Sincerely,

Don Marsh, President
CENSE.org