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Subject: Alternatives to Energize Eastside....
Date: Monday, August 14, 2017 8:47:39 AM
Attachments: [Comment on Phase 2 Draft EIS Section 2.2.1 Seattle City Light Transmission Line option.pdf](#)

Dear Records-

Please file this email and its attachment as comments under PSE IRP Docket No. UE-160918.

I have previously filed the Lauckhart-Schiffman load flow study that demonstrates there is no need for Energize Eastside.

A. The best alternative for PSE to solve any possible future reliability problem on the east side is for PSE to run all of its Puget Sound Area generation. PSE did not consider this alternative in their Eastside Needs Assessment.

B. The next best alternative for PSE to solve any possible future reliability problem on the east side is for PSE to implement enhanced DSM programs including the possible installation of battery banks on the east side. These programs have been discussed in the Energize Eastside EIS. These programs have the added benefit of helping PSE meet its Total System Peak deficiency. PSE did not consider these alternatives in their Eastside Needs Assessment.

C. If any work **on the transmission grid** is needed to provide reliable service to the greater Bellevue area, then a clear alternative that should be studied is looping the Seattle City Light line through Lakeside substation. PSE has rejected this alternative because they claim SCL will not allow them to do that. But PSE never made a formal request to have SCL loop their line through Lakeside. If PSE would make that formal request, SCL is required under FERC Order 890 to respond in accordance with the FERC ProForma Open Access Transmission Tariff (OATT). See Attachment to this email. Only when PSE gets that response can they determine if the SCL line option is the best alternative for providing reliable service to the east side. PSE did not properly consider this alternative in their Eastside Needs Assessment.

D. Further, PSE should look at the alternative of building a 230/115 KV transformer at Lake Tradition. The plan to install a new 230/115 KV transformer at Lake Tradition has been on Puget's list for several years. PSE did not consider this alternative in their Eastside Needs Assessment.

E. There is another alternative to Energize Eastside that many utilities are using today. They are building small peaker plants in the vicinity of power constrained areas. This is a particularly good option if the constraint would be expected to come in to play only very rarely as is the case in the greater Bellevue area. That constraint only comes in to play when the temperature reaches 23 degrees or below during peak load hours and when at the same time two major 230/115 KV transformers on the east side fail. The small peaker plant is low cost and takes little space and likely could be located at the Lakeside substation. It would almost never run and if needed would run for only a short period of time. This alternative has the added benefit helping PSE meet its Total System Peak deficiency. PSE did not consider this alternative in their Eastside Needs Assessment.

In their draft IRP report coming out in a few months, PSE needs to describe these alternatives and why they are not being analyzed in the IRP as alternatives to Energize Eastside.

Rich Lauckhart
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On behalf of a large number of citizens that are concerned about transmission matters in the greater Bellevue area.