Comments by James Adcock on Docket UE-220216 Petition for Penalty Mitigation Associated WASH.

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Commenting party's name: James Adcock, Electrical Engineer

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Comments on Docket UE-220216 Petition for P

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Comments by James Adcock, Electrical Engineer, MIT

In response to PSE's request that it be spared performance penalties in regard to not actually "Keeping The Lights On" I want to "put a human face on it" -- relate my experiences as a ratepayer in the South Bellevue "Eastside" Neighborhood.

I work at lot "with" PSE as a "stakeholder" in their IRP meetings, now including CEIP. PSE talks a lot there about how they need more new natural gas peakers [although they might call them "hydrogen" peaker, or "biodiesel" peakers -- the reality is that they are natural gas peakers running off of natural gas. Bog standard natural gas peakers, not "hydrogen" peakers and not "biodiesel" peakers] and how those natural gas peakers are necessary to "Keep The Lights On" -- so that we only lose power once every 20 years. These statements are devoid of reality. The reality is that we lose power maybe 20 times per year, not once every 20 years. And it is not due to a lack of new natural gas peakers. It is due to a lack of "boots on the ground" walking the lines, removing dead or dying trees and snags which keep shorting out the lines in our area -- and we live in an area where almost all the lines are underground already!

Historically, going back decades, PSE has lost power during major windstorms -- where a "major windstorm" means something like 60 MPH winds. I get it. I think other ratepayers get it -- if a 60 MPH wind happens, trees are going to fall down and we are going to lose power.

But, this is not what has been going on during recent decades. There was a period of time whenever there was a breeze -- and I mean a breeze, not even a stiff breeze -- then PSE would lose power. And whenever we had drizzle -- I'm not talking about a major rainstorm, I'm talking about drizzle -- then PSE would lose power. I don't understand the drizzle thing. If it is a major rainstorm that floods an underground vault, then I would understand why PSE would lose power -- but I don't understand why drizzle would cause PSE to lose power. But these cases have become somewhat better in the last year or two -- but in other ways things have gone further downhill.

First of all, you need to realize that PSE neither records nor reports short-term outages -- I think what PSE told me recently was outages less the 5 minutes duration -- I thought previously they had told me 7 minutes duration. So UTC is not going to even be aware of the constant shortterm outages we are experiencing -- because PSE is not going to tell you about it.

Recently PSE implemented an "automatic reclosure" feature on the lines in our area -- where if a tree branch slaps the lines during wind, the short-circuit causes the power to go out, but then a few seconds later PSE retries the lines -- re-energizes them -- to see if the short-circuit has gone away, and then turns the power back on -- until a minute or two later the same tree branch slaps the lines again, we lose power again, and this cycle continues over and over and over again. The problem is: Eventually all these short-term power outages and resulting power surges are going to "catch" our electric and electronic equipment "just right" -- in spite of our best efforts - and kill those devices.

It is not like we don't try to protect ourselves against PSE power outages and resultant surges: We have a whole house surge protector. We have "UPS" "Uninterruptable Power Supplies" on all our major electronic devices, and we have individual surge protectors on the other major devices. PSE's power outages frequently "kill" the UPS's requiring their replacement, at perhaps \$100 each -- but that is the intent -- that the UPS be sacrificed to protect the electronic equipment attached to it. But still, replacing a couple UPS's a year gets to be annoying.

Further, my wife has an injury where she cannot tolerate cold -- cold would exacerbate her medical problems -- so I have a smaller portable backup generator -- low noise to try to avoid annoying the neighbors, specifically to try to keep the furnace on -- just the furnace -- we have a dedicated "legal" generator cut-over switch for the furnace, when we lose power. \$2,000 for the generator, and maybe another \$500 to have the furnace cut-over switch installed.

Some years ago, our fridge was killed by such short-term outages, where the power came back on and the fridge condenser tried to run again before the refrigerant lines had fully warmed back up, causing excess load when the condenser tried to start back up, killing it. So that was a \$2,000 new fridge.

We had a very high efficiency stainless steel condensing "lifetime forever" hot water heater, on a battery backup, about \$8,000, which PSE managed to kill during a power outage – in spite of the fact the hot water heater ran on a large UPS. For reasons to be explained later, I was out of commission, so my wife had to get this replaced, which took a week without hot water, and another \$8,000.

Further, in terms of "COVID Emergency Supplies" we have about \$1,000 in frozen foods which will be lost during a PSE extended outage.

Now let me tell a personal story of stupidity: We all know how people do stupid things due to power outages and kill themselves, or almost kill themselves. I know this. I am well-familiar with it. And yet I became one of those persons. I have an "emergency use" TV antenna which I only use when PSE loses power -- otherwise I can get my "emergency local information" via cable TV and the Internet. But when PSE loses power I lose cable and Internet, meaning I do not know what it going on. I "solved" this problem in years past by having a "old fashioned" TV antenna mounted on the side of my house immediately outside of a deck railing, and I'd run the TV off the generator briefly in order to get the local emergency news and weather reports. Well, the storm damaged the TV antenna, twisting it around so that I could not get TV reception. So, I reached over the deck railing to fix the antenna. What happened next no one

will ever know. But eventually I was found two stories down, with a broken pelvis, damaged shoulder, about a dozen broken ribs, a broken eye socket, concussion, and a brain bleed. I spent the next year more-or-less recovering, now with two long metal rods in my pelvis. The hospital bill was for \$100,000 -- after getting a lawyer I was able to negotiate the insurance company into paying all but \$10,000.

I understand that PSE lawyers think this is all a joke. That UTC lawyers think this is all a joke. It is not. People get killed when PSE loses power. PSE does not perform "tree maintenance" the way they used to. When I talk to PSE about this, they just keep making hypothetical excuses "maybe this is happening, maybe that is happening." NO: What is happening is that PSE is not performing necessary Tree Maintenance. What we really need are "boots on the ground" -- someone actually needs to "walk the lines" noting where dead and dying tree and branches are threatening the lines. And then those dead and dying trees and branches need to be removed. PSE simply is not doing so. The proposed \$600,000 fine is microscopic in comparison to PSE annual revenue. The proposed \$600,000 fine is microscopic compared to the loses experienced by ratepayers. PSE will never change their behavior until UTC *actually* "Regulates" -- which in this case means actually imposing the fine that is supposed to be imposed for PSE's *choice* to fail to perform to agreed conditions.

Do your job. Regulate. Impose the Fine. PSE richly deserves it -- and more. PSE behavior and attitude has got to change, Now.

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