

From: [Richard](#)
To: [UTC DL Records Center](#); [Balasbas, Jay \(UTC\)](#); [Rendahl, Ann \(UTC\)](#); [Danner, Dave \(UTC\)](#)
Cc: [Don Marsh](#); [Russell Borgmann](#); [Bill Pascoe](#); [Cebulko, Bradley \(UTC\)](#); [Brian Grunkenmeyer 2](#); [Colamonic, Carla \(ATG\)](#); [Charlie Black](#); ["Charlie Grist"](#); [Court Olson](#); ["Court Olson II"](#); ["D. Mitchentree"](#); [Daren Anderson - NESCO group](#); [David Broustis](#); [David Lowrey](#); [Nightingale, David \(UTC\)](#); [Devin McGreal](#); [Don Marsh](#); [Doug Howell](#); [Ed Finklea](#); [Osborne, Elizabeth \(COM\)](#); ["emoe@umci.com"](#); ["Franco Albi"](#); ["Hill, Nate"](#); [James Adcock](#); [Jay Story](#); [Snyder, Jennifer \(UTC\)](#); [John Fazio](#); [Kelly Hall](#); [Ken Nichols](#); [Frankiewich, Kyle \(UTC\)](#); [Lea Fisher](#); ["Liz Thomas"](#); ["Mannetti, John"](#); [Mark Sellers-Vaughn](#); [Michael O'Brien](#); [Milos Stefanovic](#); [Nicole Luckey](#); [Nicols Matz](#); [Norm Hansen](#); ["Popoff, Phillip"](#); [Renee Gastineau](#); ["Saldivar, Marty"](#); [Scott Richards](#); [Shauna Jensen](#); [Johnson, Steven \(UTC\)](#); [Vlad Gutman-Britten](#); [Warren Halvrseeson](#); [Willard Westre](#); [Reynolds, Deborah \(UTC\)](#); [KvamMichele](#)
Subject: UE-160918 Further evidence there is no Firm Commitment to deliver 1350 MW of Entitlement Power to the Canada Border
Date: Tuesday, August 22, 2017 3:08:31 PM
Attachments: [image001.png](#)
[Richard Lauckhart comments made at the ColumbiaGrid Board of Directors meeting.pdf](#)

Dear Records and WUTC Commissioners:

Please include this email along with the forwarded email below and the attachment to this email in the Documents filed for the PSE IRP Docket No. UE-160918. The information provided here is **further evidence that there is no Firm Commitment by anyone to transmit 1,350 MW of Entitlement Power to the Canada border.** PSE load flows attempting to justify Energize Eastside need to be redone to remove this assumption in their load flow modeling of transmission needs in the greater Bellevue area.

Attached are comments I made at the August 16, 2017 ColumbiaGrid Board meeting. The email from Patrick Damiano of ColumbiaGrid to me today responds to those comments.

These comments are enlightening for the following reasons:

- 1) I had commented to the ColumbiaGrid Board that the writing in the ColumbiaGrid System Assessments were wrong when they stated that there is a 1,350 MW Firm Commitment to deliver Entitlement Power to the Canadian Border. In his response Patrick Damiano stated **"the Board of Directors does not adopt ColumbiaGrid's annual system assessments."** In other words, the ColumbiaGrid independent board does not verify the accuracy of statements in these ColumbiaGrid System Assessment documents.
- 2) I had commented that ColumbiaGrid was losing credibility when it did not respond to stakeholder questions posed in their Open Comment periods. In his response Patrick Damiano stated **"ColumbiaGrid is not obligated to address or respond to individual comments on the Draft System Assessment."**
- 3) I had asked ColumbiaGrid to provide evidence that they were correct in writing that there is a 1,350 MW Firm Commitment to deliver Entitlement Power to the Canadian Border. Patrick Damiano stated: **"We note that ColumbiaGrid does not have the authority under its planning process to mandate or otherwise compel a party to substantiate the details of their submittals or obligations. For further information, we suggest that you direct your inquiries to the Bonneville Power Administration or the U.S. Army Corps of Engineers, which are the U.S."**

federal entities responsible for administering the Canadian Entitlement pursuant to the Columbia River Treaty of 1964." In other words ColumbiaGrid is stating that it was BPA that told them to write that there is a 1,350 MW Firm Commitment to deliver Entitlement Power to the Canadian Border.

4) **Point number 3 above gets us into a circle.** The COLUMBIA RIVER TREATY ENTITY AGREEMENT on ASPECTS OF THE DELIVERY OF THE CANADIAN ENTITLEMENT for APRIL 1, 1998 THROUGH SEPTEMBER 15, 2024 BETWEEN THE CANADIAN ENTITY AND THE UNITED STATES ENTITY DATED MARCH 29, 1999 made it clear that Canada was supposed to have requested such a Firm Commitment if it decided it wanted one. **We have already asked BPA in a FOIA request to provide us any evidence that Canada has ever asked them to provide a Firm Commitment to deliver Entitlement Power to the Canada border. BPA responded that they had never received such a request.** Canada prefers to have its share of Treaty power delivered to entities in the United States in exchange for those entities sending money to Canada.

Once again, it is clear that PSE is improperly blaming ColumbiaGrid for its decision to include large flows to Canada in their Eastside Needs Assessment. ColumbiaGrid says it is only passing on information provided them by BPA. But BPA has told us that they have no such commitment.

Rich Lauckhart
Energy Consultant
Davis, California

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

From: Patrick Damiano <Damiano@ColumbiaGrid.org>

Sent: Tuesday, August 22, 2017 12:06 PM

To: Richard Lauckhart (lauckjr@hotmail.com)

Cc: Kris Mikkelsen; Jim Miller; Ed Sienkiewicz

Subject: August 5, 2017 Comments to Board Members on ColumbiaGrid's Draft 2017 System Assessment

RE: [August 5, 2017 Comments to Board Members on ColumbiaGrid's Draft 2017 System Assessment](#)

Mr. Lauckhart:

Thank you for your participation in ColumbiaGrid's transmission planning process. The

Directors have requested that I respond to your e-mails to the ColumbiaGrid Board Members, dated August 5, 2017, regarding certain inputs to ColumbiaGrid's Draft 2017 System Assessment ("Draft System Assessment"). Specifically, you inquired about the details of an existing transmission service obligation that is referenced in the Draft System Assessment (the "Canadian Entitlement," e.g. Draft System Assessment at 21-22). Pursuant to ColumbiaGrid's planning process, the Board of Directors does not adopt ColumbiaGrid's annual system assessments. The Board of Directors does, however, adopt ColumbiaGrid's biennial transmission expansion plans ("Plan") and updates to the Plan.

The Draft System Assessment is an integral component of the ColumbiaGrid planning process. Pursuant to that planning process, ColumbiaGrid's staff, in coordination with the relevant parties and stakeholders, conducts a system assessment to determine the ability of each party to serve its network load, native load obligations and long-term firm obligations over the planning horizon. During the planning process, ColumbiaGrid conducts numerous planning meetings that are open to the public for stakeholder involvement and input.

Based on your earlier submittals and your emails to the Board Members, we understand that you are requesting additional details regarding the Canadian Entitlement. While ColumbiaGrid endeavors to implement the planning process as transparently as possible, ColumbiaGrid is not obligated to address or respond to individual comments on the Draft System Assessment. Instead, ColumbiaGrid carefully considers all comments it receives from planning parties, interested persons, and other stakeholders to understand the applicability of such comments to the finalization of the Draft System Assessment. Thus, ColumbiaGrid had considered your earlier submittals during the comment window consistent with its planning process.

The Canadian Entitlement was identified as an obligation previously submitted in ColumbiaGrid's planning process. As such, it is subject to analysis and inclusion in the Draft System Assessment. We note that ColumbiaGrid does not have the authority under its planning process to mandate or otherwise compel a party to substantiate the details of their submittals or obligations. For further information, we suggest that you direct your inquiries to the Bonneville Power Administration or the U.S. Army Corps of Engineers, which are the U.S. federal entities responsible for administering the Canadian Entitlement pursuant to the Columbia River Treaty of 1964. We also refer you to answers and responses regarding the Canadian Entitlement within FERC Docket No. EL15-74-000.

Moreover, some information that you requested may not be appropriate for disclosure or dissemination. ColumbiaGrid has an obligation to protect any information it receives during the planning process that qualifies as Confidential Information and Critical Energy Infrastructure Information ("CEII"). Therefore, ColumbiaGrid cannot satisfy your earlier requests submitted during the comment window for the Draft 2017 System Assessment. For further information regarding Puget Sound Energy's ("PSE") Energize Eastside Project, we suggest that you direct your inquiries to PSE.

Thank you again for your input and involvement in ColumbiaGrid's planning process. The success of ColumbiaGrid's mission to improve the reliability and efficient use of the Northwest's transmission grid is dependent on the solicitation of diverse viewpoints, which is only possible through broad participation in the planning process.

Sincerely,

Patrick Damiano

President & CEO

503-943-4933



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ColumbiaGrid's mission is to improve the planning, expansion, and efficient use of the Northwest Transmission Grid. www.columbiagrid.org