

From: [Russell Borgmann](#)
To: [UTC DL Records Center](#)
Cc: [Russell Borgmann](#)
Subject: Public Comments to the WUTC Regarding PSE IRP Docket No. UE-160918
Date: Saturday, August 19, 2017 8:20:01 AM

Honorable UTC Commissioners:

All customers want the most reliable electricity at the most fair price. WAC 480-100-238 defines it as “Lowest Reasonable Cost”.

For many years, BPA has needed to solve transmission line congestion during an N-1-1 system fault along the Monroe-Echo Lake #1 500kV transmission segment. BPA’s own studies clearly show the MOST RELIABLE grid reinforcement solution is the “Monroe-Echo Lake #2” option.

TCRM is a measure of curtailment risk – the risk of power brown-outs or black-outs. The lowest TCRM (Total Curtailment Risk Measure) is best. TTC is the measure of Total Transfer Capability – a measure of the total capability of power that can be transferred. The highest TTC is best.

Bonneville Power Administration has determined that the most reliable grid reinforcement project is the “Monroe-Echo Lake #2” option. The ColumbiaGrid **Puget Sound Area Study Team Report** (data tables, pg 19, Study 49) clearly states:

Monroe-Echo Lake #2 (ColumbiaGrid Study 41)

TTC	2,916
TCRM	4,143
Est. Cost	\$633M (spread over tens of millions of ratepayers in BPA’s territory)

Sammamish-Lakeside-Talbot (ColumbiaGrid Study 49, now known as “Energize Eastside”)

TTC	2,233
TCRM	10,286
Est. Cost	\$398M (spread over 1.1M PSE ratepayers, some insignificant cost sharing by BPA/SCL)

PSAST Report: <https://www.columbiagrid.org/download.cfm?DVID=2157>

The Sammamish-Lakeside-Talbot (aka: **Energize Eastside**) has **2.5X MORE RISK and only 76% of the transfer capability** of the Monroe-Echo Lake #2 option. The numbers above tell the story.

In the **PSAST Report**, the BEST technical, and most reliable solution is the **Monroe-Echo Lake #2** option, **Study 41** (bottom of page, pg 19). It has the lowest risk (smallest Total Curtailment Risk Measure, TRCM) and highest transfer capacity (highest TTC). A clear win-win solution. However on **page 16** of this report, they state that they have chosen the “Sammamish-

Lakeside-Talbot” solution because of COST (see also pg 19, Study 49).

“The lowest TCRM and highest TTC for line improvements east of Lake Washington can be achieved by building the Monroe-Echo Lake #2 500kV line in addition to the 115kV system fixes. Unfortunately, this is also the highest cost transmission option. Of the remaining options, the Sammamish-Lakeside-Talbot option is recommended because it results in comparable TCRM while also providing the necessary Puget Sound Energy load service at a much lower cost.” (pg 16).

Energize Eastside was selected because it was the lowest cost **FOR BPA**, - NOT for PSE ratepayers.

What is the lowest cost for ratepayers? Monroe-Echo Lake #2, while estimated at \$633M, can be spread over tens of millions of ratepayers in BPA’s 8-state territory. Energize Eastside (nee: Sammamish-Lakeside-Talbot), now estimated at \$300M, is only spread over 1.1 million PSE ratepayers. Energize Eastside is much more expensive for ratepayers.

BPA, ColumbiaGrid, PSE, and SCL are playing a financial shell game with Energize Eastside in their Memorandum of Agreement (MOA).

http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/2015-06-01_moa_with_bpa-seattlecitylight-pse.pdf

The MOA (amended April 2015, link above) states, *“Concerning the Puget Preferred Plan Projects identified in Section 3(b) of the MOA, the parties agree that the **BPA funding originally intended for these projects** will instead be directed under separate agreement to PSE’s Whatcom County Transformer project. Accordingly, the parties acknowledge that BPA is not involved in any manner or capacity in PSE’s Sammamish to Lakeside to Talbot Rebuild Project or its Lakeside 230 kV Transformer Addition Project.”*

This MOA goes out of its way for BPA to disavow any association with Energize Eastside, yet, it also clearly states that **BPA funding was, in fact, originally intended for this project.**

BPA is merely diverting payment for Energize Eastside to another project in Whatcom County. This is a maneuver to **avoid FERC cost allocation requirements** as well as to **avoid triggering a NEPA review.**

In that same MOA, paragraph 3(a), *“Upon completion of the Puget projects, PSE shall submit an invoice or payment to SCL for the SCL cost obligations associated with construction of the Puget Preferred Plan Projects.”*

Why would Seattle City Light pay PSE, if Energize Eastside is solely to address Puget Sound Eastside (local) load growth? BPA is going out of its way to misdirect and divert funds from a

broader REGIONAL project that addresses west coast grid reinforcement to avoid a NEPA review and circumvent FERC involvement.

On page 15 of the **PSAST Report**, ColumbiaGrid acknowledges that building Energize Eastside satisfies the goal of resolving a BPA single-point-of-failure grid congestion problem (*“provide two new north-south, high capacity 230kV parallel circuits, **strengthening the grid** underlying the **single Monroe-Echo Lake 500kV line.**”*)

Why isn't Energize Eastside a federal project that requires NEPA, not just SEPA?

PSE **elected** not to include Energize Eastside into the regional transmission plan by their own choice – much like PSE, thus far, has **elected not to include Energize Eastside as part of IRP** transmission planning, even though transmission planning is required by WAC statute (WAC 480-100-238). It appears that PSE is playing both sides of the argument based on convenience for PSE. As a regulated utility, I ask the WUTC will put an end to this gamesmanship and hold PSE accountable for inclusion of Energize Eastside in 2017 IRP as well as inclusion in the regional transmission plan.

Local load growth can be addressed by smaller, scalable, more affordable solutions that have significantly less environmental impact than Energize Eastside. Let BPA address grid congestion with the BEST solution (the Monroe-Echo Lake #2 project) - the most reliable solution, and the lowest cost solution to ratepayers. Let PSE address local load growth issues via appropriate, scalable solutions. Those alternatives could include an additional transformer at Talbot Hill (Renton) and scalable battery storage.

UTC, please ask PSE to include scalable, reliable, distributed solutions for the Puget Sound eastside in their IRP. Let PSE build a solution that is sized for local Eastside needs, at a cost lower than “Energize Eastside” to maintain fairly price electricity in the Puget Sound.

The IRP is being evaluated in the context of providing “lowest reasonable cost”. Please require PSE to meet that requirement.

Sincerely,

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