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Subject: Comments and Questions on PSE's Draft 2017 Integrated Resource Plan in UE-160918
Date: Tuesday, September 12, 2017 1:34:39 PM

Records- Please include this email in PSE IRP Docket No. UE-160918

Michele-

In your email of today sending out the Draft 2017 PSE IRP you state: *"After reviewing the material, if you have concerns or questions, please let me know, and we will include them at the October 5 IRPAG meeting."*

Here are my concerns and questions. They relate to the Energize Eastside project. **I look forward to getting a response to these questions, challenges and concerns at the October 5, IRPAG meeting.**

All mention of the Energize Eastside project is included in Chapter Chapter 8, "Delivery Infrastructure Planning."

Chapter 8 provides links to certain documents that PSE has previously provided in the Energize Eastside EIS to show the need for Energize Eastside. But all those documents have been criticized on the Energize Eastside EIS. Those same documents have also been criticized in the PSE IRP process. These criticisms can be found in the documents included in the record for PSE IRP Docket No. UE-160918. Yet PSE has not responded to these criticisms in either the Energize Eastside EIS or in this PSE IRP Docket No. UE-160918.

For example see the following documents on the record in UE-160918:

- 1) The UE-160918 Lauckhart_Schiffman Load Flow modeling for "Energize Eastside" report dated February 18, 2016 points out the problems with the PSE attempts to show a need for Energize Eastside and points out that if these problems are fixed, then Energize Eastside is not needed.
- 2) The UE-160918 Rebuttal to PSE Criticisms of the Lauckhart-Schiffman Load Flow Study. This March 28, 2016 rebuttal of PSE criticisms of the Lauckhart_Schiffman study includes questions and challenges to PSE that PSE has never responded to. Those questions and challenges are:

1. We challenge PSE or ColumbiaGrid to cite a specific requirement to transmit 1,500 MW to Canada in the NERC Reliability Criteria or PEFA.
2. We challenge PSE, ColumbiaGrid, or BPA to produce a contract showing a Firm Commitment to deliver 1,500 MW to Canada.
3. We challenge PSE to prove that they did not increase flow to Canada relative to the WECC Base Case.
4. We challenge PSE to explain how they solved issues that arise from their scenario with the electrical limits of the "West of Cascades-North" transmission lines.
5. We challenge PSE to explain their methodology leading to a 2.4% growth rate. We further challenge PSE to dispute the methodology used by Lauckhart-Schiffman to estimate future growth. Both methods should be reviewed by qualified experts.
6. We challenge PSE to cite standards that require them to turn off 6 local generation plants at the same time they are serving peak demand with an N-1-1 contingency.
7. We challenge PSE or BPA to provide examples of when 1,500 MW was transferred to Canada when temperatures in the Puget Sound region were lower than 23° F, as stipulated in PSE's Energize Eastside Needs Assessment.

At the October 5, 2017 PSE IRP Advisory Group Meeting, please respond to these questions/challenges.

- 3) The 160918 Fatal Flaws in the PSE justification of the need for Energize Eastside. PSE has never responded to the information provided in this "Fatal Flaws" document.
- 4) The UE-160918 Blowing the Whistle documents. PSE has never responded to these three documents.
- 5) I also note that the PSE Draft 2017 IRP includes the following statement:

"Though the need for Energize Eastside is driven by local demand, because the electric system is interconnected for the benefit of all, it is a federal requirement to study all electric transmission projects to ensure there are no material adverse impacts to the reliability or operating characteristics of PSE's or any surrounding utilities' electric systems."

I have provided comment on this matter in the document UE-160918 Copy of Oral Comments made at ColumbiaGrid-WUTC Special Presentation July 31 2017.pdf. In that document the following is stated:

*It is one thing for ColumbiaGrid to test to assure that Energize Eastside (a purely local project) does not adversely impact another utility. **It is quite another thing for ColumbiaGrid to tell***

PSE that their Energize Eastside project needs to help BPA increase its ability to deliver Canadian Entitlement power to the Canadian border. Note:

- a. ColumbiaGrid does not have that kind of authority
- b. There is no Firm Commitment for PSE to deliver Canadian Entitlement power to the Canadian border. Why would PSE customers need to pay to help BPA meet an obligation to deliver Canadian Entitlement power to the Canadian border?
- c. Even more telling...there is no Firm Commitment that BPA (or any other United States Entity) has to deliver Canadian Entitlement power to the Canadian border.
- d. And even further telling...We know that the grid cannot deliver 1,350 MW to the Canadian border under heavy winter conditions in 2017...before Energize Eastside is built (or after Energize Eastside is built for that matter).

PSE has not responded to this comment on ColumbiaGrid's role.

I look forward to getting a response to all the questions, challenges and concerns listed above at the October 5, IRPAG meeting.

Richard Lauckhart
Energy Consultant

On behalf of a large number of eastside residents that are concerned about transmission plans on the eastside.