

Citizens for Sane Eastside Energy (CSEE)

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February 5, 2018

To: The Washington Utilities and Transportation Commission

Docket UE-160918

[submitted by email to records@utc.wa.gov](mailto:records@utc.wa.gov)

Re: Inadequacies in PSE's IRP include several misrepresentations regarding Energize Eastside

Dear Honorable Commissioners:

Citizens for Sane Eastside Energy (CSEE) is an Eastside citizens action group. This letter supplements our earlier letter to you of January 18, 2018, and addresses the following issues of continuing concern regarding PSE's insufficient and inadequate IRP as to three (of many) topics about which PSE has consistently lied to the UTC and the public:

1. "1,500 MW to Canada"

Energize Eastside (EE) is an old, dusted-off project whose primary intent was to meet a perceived need in 2003 for delivery of more power to Canada, in an area technically called the Northern Intertie at the Canadian border. BPA led this charge, concerned that up to 1,500 MW of power might be needed to send to Canada under a treaty with the United States. 1,500 MW is a lot of power, about what the city of Seattle consumes daily under normal conditions.

This 2003-inaugurated project was called Snohomish-Lakeside-Talbot. "Energize Eastside" is still called Snohomish-Lakeside-Talbot by ColumbiaGrid, the regional entity that PSE belongs to. Yet without disclosing the historical origins of EE, PSE dusted it off in 2014 and claimed it was a "new" project for local load only. Nevertheless, PSE kept in EE the supposed need to supply Canada with 1,500 MW from the old project (*1,500 MW that can never be delivered, anyway* — see Section 2 below), and used that as a factor in PSE-sponsored load flow studies to justify EE. USE, an independent consultant hired by the City of Bellevue, assumed PSE's 1,500 MW assumption was correct and erroneously adopted it without question.

Without that 1,500 MW factored into the computer simulation for an extreme cold day — an event that would stress system reliability — we now know there is no need for EE. The Lauckhart-Schiffman load flow studies prove that, and these are the only load flow studies ever done that are totally transparent. PSE has steadfastly refused to fully disclose the key data it used in its studies,¹ though we know it had to have relied on these bogus 1,500 MW to make its

¹ Even though FERC has stated that our expert, Richard Lauckhart, is CEII-cleared and entitled to *all* the data in the PSE-sponsored load flow studies. This stonewalling by PSE violates NERC/FERC Reliability Requirement TPL-001-4 which mandates that PSE conduct Planning Assessment in an "open and transparent stakeholder process."

studies come out the way they wanted.²

PSE claims there is a “firm commitment” for PSE to deliver those 1,500 MW, though BPA in a reply to my FOIA request states that no such firm commitment exists.³ And clearly, neither PSE nor its customers are required to pay for local transmission sufficient to deliver 1,500 MW to Canada.⁴

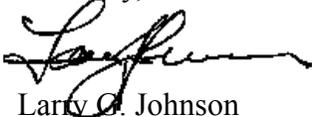
2. Voltage collapse

ANY such 1,500 MW “commitment” is impossible to meet, anyway. Why? Because there would not be transmission capability over the Cascades to deliver the needed amount of power to meet Puget Sound Area peak load and deliver this 1,500 MW to Canada. If PSE ever were to try to send 1,500 MW to Canada, or even significantly lesser amounts, there would be a **voltage collapse as a result**. To prevent appliances and motors from being fried due to low voltages, there would have to be a massive power shutdown in Western Washington in such an event. In other words, a blackout. PSE’s load flow studies must surely have shown them that, and that is almost certainly the reason why they won’t show their homework.

3. No Eastside “backbone”, but rather a 115 kV network that needs no upgrading

PSE’s PR about the “backbone” of the grid on the Eastside having not been upgraded since the 1960s is not true. Starting as early as 1992, PSE considered upgrading the Lakeside transformer and feeding it with 230kV lines to replace the existing 115kV lines as contemplated by EE. Instead, over the years PSE has built a number of new 115kV lines to meet energy demand increases in the 1990s and into the early 2000s. **What we have on the Eastside is a 115kV network, not a single backbone.** See the attached graphic prepared by former Puget Power VP for Power Planning, Richard Lauckhart, that shows this 115kV network. This system needs no further “upgrading.”

Sincerely,



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cc: IRP Advisory Group members; CENSE; City Councils of Bellevue, Newcastle and Renton

² PSE claims it is constrained to design Energize Eastside to an extreme because of “federal regulations,” even though those regulations require maintaining reliability only as far as an N-2 event. In adding the bogus 1,500 MW to Canada *and turning off 10 peaker plants in Western Washington specifically built to meet high peak demand*, PSE-sponsored and the USE load flow studies simulate a phantasmagorical N-8 event in order only then to demonstrate a “need” for the project.

³ See attached letter to me from the BPA dated July 27, 2015, especially the highlighted last paragraph on page 2. PSE admits it would have to redo its load flow studies if there is indeed no such commitment: see video at <https://youtu.be/UixzsxOmPic>. Yet it has not done so to date.

⁴ PSE signed a Memorandum of Understanding with the BPA and Seattle City Light in 2012 whereby the latter two agreed to help pay for the cost of Energize Eastside. That agreement is still in effect, thus begging the question: How could this agreement have occurred if EE is “entirely local.”

New 115 KV lines built in the eastside in recent years...
no longer a “backbone”, now a “network”!

