

South Bellevue Public Meeting | Nov. 14, 2017

Note: Puget Sound Energy believes in protecting your privacy. Information you provide will be added to the project mailing list and you may receive project updates. Unless required by law, Puget Sound Energy will not share your contact information with anyone outside of the project.

Name	Contact info (address, phone, email)	Follow-up topics
Daren Anderson	9424 117th Ave NE Kirkland WA 98033 4257610548 daren@pscogroup.com	What if multiple batteries are interconnected at 12.5 KV at multiple locations.



# Public Meeting Comment Form

Energize Eastside Conditional Use Permit (File # 17-120556-LB) and  
a Critical Areas Land Use Permit (File # 17-120557-LO)

**Tuesday, November 14, 2017 | 6:30 pm**

**South Bellevue Community Center**

Name: Jeanne Warne Address: 13608 NE 30<sup>th</sup> PL 98005 Email: jeanne.warne@comcast.net

Comment:

- My primary concerns are in regards to transparency, aesthetics & safety
- ① Transparency - Is this project really needed? Is it truly the best way to solve the problem and are local needs truly being considered? I've heard PSE's speak and looked at their web-site, but NONE of those questions have been honestly addressed.
  - ② Aesthetics - What PSE says they will deliver (less poles, better use of space, healthier trees) and what their own images project are VASTLY different. I hope you heard the collective GASPS in the room when those images were shown. We live in Bellevue because it is a beautiful place and not an industrial site. Sure if this was the ONLY or BEST way, we would accept it - but it is not and it will destroy so much of what makes Bellevue beautiful.
  - ③ Safety - I have yet to see a truly independent assessment of the safety of the pipeline co-existing with the existing powerlines - never mind ↑↑↑ voltage AND construction. And interestingly, in the 10 years we've owned our home only once has the pipeline been inspected for safety and

By completing this form you will be notified of any future city recommendations or decisions on the proposed project that was within the past 6-months. This is a HUGE concern to me, DSD 004541

## Bedwell, Heidi

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**From:** Brit Harris <brit.harris@gmail.com>  
**Sent:** Sunday, November 26, 2017 2:27 PM  
**To:** Miyake, Brad; Helland, Carol; Brennan, Mike; Bedwell, Heidi; Matz, Nicholas; Stokes, John; Chelminiak, John; Lee, Conrad; Robertson, Jennifer S.; Robinson, Lynne; Wallace, Kevin R; Simas, Ernie; Council  
**Subject:** High Voltage Power Lines

Please do not allow PSE to put high voltage power lines near Tyee Middle school. As an engineer myself, I know there are always going to be safety risks by placing them next to fuel lines. **There are no measure that can eliminate all safety risks.**

According to the National Cancer Institute (<https://www.cancer.gov/about-cancer/causes-prevention/risk/radiation/electromagnetic-fields-fact-sheet>) the interpretation of the finding of increased childhood leukemia risk among children with the highest exposures (at least 0.3  $\mu\text{T}$ ) is **unclear**. Several studies have analyzed the combined data from multiple studies of power line exposure have found an **increase in childhood leukemia**(details are listed in the above link).

**Extremely low frequency EMFs (ELF-EMFs).** Sources of ELF-EMFs include power lines, electrical wiring, and electrical appliances such as shavers, hair dryers, and electric blankets.

In 2002, the International Agency for Research on Cancer (IARC), a component of the World Health Organization, appointed an expert Working Group to review all available evidence on static and extremely low frequency electric and magnetic fields ([12](#)). The Working Group classified ELF-EMFs as **“possibly carcinogenic to humans,”** based on limited evidence from human studies in relation to childhood leukemia.

In 2015, the European Commission Scientific Committee on Emerging and Newly Identified Health Risks reviewed [electromagnetic fieldsExit Disclaimer](#) in general, as well as cell phones in particular. It found that, overall, epidemiologic studies of extremely low frequency fields show an **increased risk of childhood leukemia** with estimated daily average exposures above 0.3 to 0.4  $\mu\text{T}$ ,

**Until further studies can eliminate this as a risk, we should assume that this is still a high possibility. Please do not expose the children to these power lines for long periods of time!**

Thank you for your support!  
Brit Harris

## Bedwell, Heidi

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Tuesday, November 14, 2017 8:22 AM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; kesayian@aol.com; llopez@mstarlabs.com  
**Subject:** RE: PSE Application/November 14 meeting  
**Attachments:** Energize Eastside and Bellevue Land Use Code.pdf; CENSE questions 11-14-17.pdf

Heidi,

CENSE has decided to skip the presentation of slides at tonight's meeting. We will submit written questions based on Bellevue's Land Use Code (attached). Since our neighbors would probably prefer not to hear all the code references in an oral presentation, we will present a shorter summary of three questions that may be of special interest to residents. I have attached a copy of that as well.

Thank you for the opportunity to provide meaningful input into the City's permit decision process.

Don Marsh

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, November 10, 2017 7:46 AM  
**To:** don.m.marsh@hotmail.com; llopez@mstarlabs.com  
**Cc:** jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Hi Don,

Yes your comments can be accommodated and we will be using a projector for the other presentations so you are welcome to have ppt slides. I appreciate your acknowledgement that the time limit would be 5 minutes. As I've noted to Loretta, the purpose of this meeting isn't necessarily to take comment like the EIS meetings but we are providing a portion of the meeting for comments. If you'd like your presentation included as part of the project file public comment please provide me with a copy of your presentation. Let me know if you have any other questions.

Thank you for your continued involvement in this process. Note that comments addressing the city's permitting criteria are most helpful at this step in the process. I've attached these code excerpts for your reference and will be providing this same information during the public meeting.

Happy Veterans Day to all!



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Don Marsh [<mailto:don.m.marsh@hotmail.com>]  
**Sent:** Friday, November 10, 2017 5:39 AM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>; [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)  
**Cc:** [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

CENSE would like to make a comment at the November 14 meeting. Our comment will be no more than five minutes long, and we would like to show some PowerPoint slides. Will this be allowed?

Don

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Wednesday, November 08, 2017 2:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 10:04 AM  
**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. 😊

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
- Staff Presentation on the Permit Process
- PSE project presentation
- General Comment
- Open House

Meeting end time 9:00 as we will need to vacate the community center by 9:30.

I, as city staff reviewing the application, will outline the permitting process, opportunities for public comment and engagement, and tips on how to provide effective timely comments. PSE will provide a brief presentation highlighting the project details. Because we are early in the permitting process we do not expect (but can imagine) people may have specific formal comments on the project. We are allowing for time for meeting attendees to provide initial comments if they have them at this point. If they'd like them formally entered into the record then comment should be in writing and include name and address. Comment forms will be provided. Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. As I've noted in the past public comments can be accepted up until staff prepares their recommendation to the hearing examiner. And then of course you can also participate in the public hearing itself. Finally, the public will have an opportunity to speak directly with city staff if they have questions about the process and to speak with PSE staff to address questions about how the project may affect their property specifically in an open house format.

This step (the public meeting) in the permitting process is meant as an introduction to the project details and process. I will be mindful as the permitting process proceeds to ensure that outcomes of the city's review, recommendation and decision are clearly communicated to effected parties. Another public meeting will be held prior to the hearing examiner's public hearing. This will be an opportunity for the public to understand the progression of the proposal- if there are any changes either made by PSE or requested by the city. Of course I am also always available to meet directly with property owners who may not want or be able to attend a public meeting or have questions specific to their property that I'm able to answer. Related to that, I noted that on the CENSE webpage you do have my name listed as a city review contact however when the email all contacts is selected the email generates david pyle's email address. Just wanted to draw that to your attention so that emails can be reach their intended audience.

I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Monday, November 06, 2017 5:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jpmmedley@mac.com](mailto:jpmmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

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**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

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**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

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**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



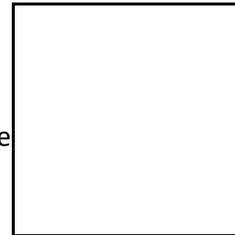
You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

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This email was sent to [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com) using GovDelivery Communications Cloud on behalf of: City of Bellevue Washington · 450 110th Ave NE · Bellevue, WA 98009 · 425-452-6800



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November 14, 2017

CENSE has many unanswered questions about PSE's Energize Eastside project, and we have submitted those questions in a document. During this public comment section, we would like to focus on our top three questions:

1. Is it legal for PSE to divide this project into two independently permitted and constructed sub-projects? This idea, which was proposed *after* the final comment period for the EIS, has not been adequately studied. Is it safe for the pipelines that share the corridor to operate just the southern sub-project? What happens if the northern part is not permitted? Does half the project meet PSE's original goals? If PSE wants to build two separate projects, shouldn't there be two separate Environmental Impact Studies?
2. On November 1<sup>st</sup>, Canada published a report titled "British Columbia Utilities Commission Inquiry Respecting Site C." This report states, "The Clean Energy Act requires that BC Hydro be self-sufficient for energy and capacity." This is one of three reasons that the Commission uses to explain why Canada no longer relies on electricity imported from the U.S. Given this new information, does PSE still believe it is necessary for the company to facilitate transfers of 1,500 MW to Canada?
3. According to Bellevue Land Use Code, PSE must demonstrate need to build the project. This year, the Bonneville Power Administration cancelled a billion-dollar transmission line in southwestern Washington. Canada's Site C dam project is now perilously close to being cancelled. In both of these cases, demand for electricity is lower than previously forecast. Can PSE show that electricity demand is growing in the neighborhoods impacted by Energize Eastside? More specifically, can PSE show ten years of peak demand data from the Eastgate, Somerset, and South Bellevue substations?

Don Marsh, President  
CENSE.org

## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Monday, November 20, 2017 2:11 PM  
**To:** jeanne.warme@comcast.net  
**Subject:** Jane Warme Comment Received  
**Attachments:** Jeanne Warme Public Comment.pdf

Hello Jeanne,

I wanted to provide you with an acknowledgement that I have received your written comments on the Energize Eastside Conditional Use and Critical Areas land use permit application. Your comments will be part of the city's file and will be considered as part of the review of the proposal. You are listed as a party of record and will receive notice of the future public meeting as well as the notice of public hearing, and Director's recommendation. Thank you for taking the time to participate in the process and to provide comments on the proposal.

Sincerely,  
Heidi



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
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The City of Bellevue has land use codes that relate to the siting, safety, and alternatives for electrical infrastructure. CENSE asks the City to be diligent in following these codes as they apply to PSE's "Energize Eastside" project.

## Operational need

BLUC 20.20.255.E.3 states, "The applicant shall demonstrate that an **operational need** exists."

PSE describes the need to avoid a power outage when the following conditions occur:

1. The temperature falls below 23 degrees F.
2. Peak demand is occurring on a work day between 6-10 AM or 5-9 PM.
3. Two of the four transformers that serve the Eastside fail.
4. Regional transfers of 1,500 MW to Canada are occurring.
5. Eleven of the 20 local generation plants that serve the Eastside are offline.

To validate that this set of assumptions reasonably establishes an operational need, we ask the following questions:

Q1: How likely is it that this set of conditions will happen in the next 20 years? How many outages would be avoided if this project were built, and what would the total duration of avoided outages be?

Q2: During the past five years, how often has 1,500 MW been exported to Canada when the temperature is 23 degrees or lower in the Puget Sound region?

Q3: Can PSE show firm contracts that require the company to facilitate large energy transfers to Canada even under extreme outage conditions?

Q4: Studies performed by ColumbiaGrid and Lauckhart-Schiffman raise questions about the capacity of eleven regional transmission lines known as the "West of Cascades, North" path to serve this scenario. The path capacity is rated at 10,000 MW. What level of electricity was transmitted on this path in PSE's simulations of this scenario?

## Reliability

BLUC 20.20.255.E.4 states, "The applicant shall demonstrate that the proposed electrical utility facility **improves reliability** to the customers served and reliability of the system as a whole."

Q5: How much would Energize Eastside improve the reliability metrics SAIDI and SAIFI that PSE reports to Bellevue annually?

Q6: Which NERC reliability statute requires PSE to assume 11 local generation plants are offline during an N-1-1 outage and heavy winter demand?

## Safety

BLUC 20.20.255.G states, "The City may impose conditions relating to the location, development, design, use, or operation of an electrical utility facility to mitigate environmental, **public safety**, or other identifiable impacts."

CENSE remains concerned about the construction and operational risk of collocating extra high voltage transmission lines in the same narrow utility corridor with two half-century-old petroleum pipelines.

Q7: The Energize Eastside EIS defines risk as the likelihood of an accident multiplied by the economic and health impact of the accident. Using this definition of risk, what is the risk of a power outage in the scenario PSE has described?

Q8: What is the risk of a pipeline fire caused by a construction accident, accelerated corrosion of the pipeline, arcing of electricity from a downed power line, lightning striking a metal pole, or earthquakes? Are these risks increased by this project?

Q9: During the past 15 years, how often have transmission lines fallen in the 18-mile corridor affected by this project?

Q10: During the past 15 years, has PSE or its contractors ever caused accidental damage to a buried pipeline?

Q11: If an accident were to occur, how long would it take for the Bellevue Fire Department to extinguish the fire? What is the worst-case scenario for the community?

## Siting

BLUC 20.20.255.G states, "Where feasible, the preferred site alternative ... is located within the land use district requiring additional service and **residential land use districts are avoided** when the proposed new or expanded electrical utility facility serves a nonresidential land use district."

Q12: During the past five years, how has electricity demand grown in the residential areas that will be impacted by Energize Eastside? Is the primary need to serve growth in Bellevue's downtown core and the developing Spring District?

BLUC 20.30B.140.D stipulates, "The conditional use will not be **materially detrimental to uses or property** in the immediate vicinity of the subject property."

Q13: Are taller poles installed within striking distance of homes and any increase in the risk of catastrophic pipeline fires materially detrimental to these properties?

## Alternatives

BLUC 20.20.255.D.3 states, "Upon submittal of the Conditional Use Permit application... the applicant shall: Describe the **range of technologies considered** for the proposed electrical utility facility."

In 2015, PSE hired Strategen to study the feasibility of batteries.

Q14: Can PSE or Strategen explain precisely why a 14 MW shortfall requires a 328 MW battery?

Q15: PSE recently determined that a "flow battery" is more cost-effective than a lithium ion battery. Will PSE or Strategen update the analysis to reflect this finding?

Submitted by CENSE  
November 14, 2017

## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Thursday, November 16, 2017 11:27 AM  
**To:** Karen Esayian  
**Cc:** Don Marsh; llopez@mstarlabs.com; Janis Medley  
**Subject:** RE: Comments on EE and CUP?

Good morning Karen,

Thank you for getting in touch regarding your questions. Comments provided on the Draft EIS (both Phase I and II) are included and considered as part of the Final EIS preparation. Specifically, the Final EIS will include copies of the comments that were submitted during the EIS comment periods and will also include responses to those comments. As I mentioned in my presentation at the public meeting on Tuesday evening, we are anticipating the Final EIS will be completed and available in February, 2018.

Regarding the two current permit applications under review with the City of Bellevue- comments that address PSE's Conditional Use Permit (CUP) or Critical Areas Land Use Permit (CALUP) should be submitted as part of the City's permit review land use process. This is because individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) in order to be a party of record for the CUP/CALUP applications. Prior submission of comments concerning the EIS during the EIS comment periods does not automatically make the EIS commenter a party of record regarding the City's subsequent review of PSE's specific permit applications.

Please note that the above-described land use process does not necessarily mean all comments submitted previously as part of the EIS process need to be resubmitted as part of the permit review process. In fact, the most appropriate comments during the permit review process would address PSE's specific permit applications, the current proposal, and the city codes and standards applicable to the permit applications.

Finally, I want to correct an error in the statement that Norm Hansen made during his comments at the November 14, 2017 public meeting. My contact information (including email) was in fact listed as part of the permit page and noticing information on the City's webpage. Norm appears to have overlooked this information when he made his public comment at the meeting, and I want to clear up any confusion caused by his incorrect statement regarding the availability of my contact information. As I explained at the public meeting, any comments concerning PSE's permit applications and the City's processing of those applications can be sent to me.

Hope this additional information provides you with the answers you needed. I will be working with our communications staff to add this information to our permitting page as well since I'm sure you're not the only person who may be asking the question.

Have a great day.  
-Heidi



**Heidi M. Bedwell**  
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**From:** Karen Esayian [mailto:kesayian@aol.com]  
**Sent:** Thursday, November 16, 2017 7:53 AM  
**To:** Bedwell, Heidi  
**Cc:** Don Marsh ; llopez@mstarlabs.com; Janis Medley  
**Subject:** Comments on EE and CUP?

Good morning Heidi,

My question and concern is about the Energize Eastside proposal and permit application by PSE.  
Specifically: commenting on the Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO

During the comment periods for Phase I and Phase II of the EIS we were assured that our comments would all be included and reviewed in the FEIS.

Now that we are in a 'comment period' for the EE application there is confusion as to whether the comments made by Eastside residents in Phase I and Phase II will definitely be carried over and included in the current comment period. Or.....must all residents who wish to be a party of record once again submit comments, names and addresses to be included in this process?

(These questions were not fully addressed on the City's webpages, see below)

My notes are incomplete from the 11/14 meeting as to suggested comment topics.  
Could you outline them?

Thank you for your work on behalf of Bellevue residents.  
Please include an email address for submitting additional comments.

Karen Esayian  
4601 135thAve SE  
Bellevue, 98006

Will my comments make any difference?

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Your comments help ensure that the best decision is reached. All comments are read and carefully considered before a decision is issued. Please consider the following when commenting:

- Comments made early in the decision process are generally more effective than comments made later.
- Each application type has criteria that must be met in order to be approved. If you object to a proposal, you may want to show where you believe the applicable criteria are not met.
- You cannot appeal a decision unless you provided written comments before the decision was made.

- When a commenter provides their name and address they become a party of record. Being a party of record to a decision allows a commenter to appeal a decision.
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Sent from my iPad

## Bedwell, Heidi

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**From:** Karen Walter <KWalter@muckleshoot.nsn.us>  
**Sent:** Friday, November 17, 2017 12:06 PM  
**To:** Bedwell, Heidi  
**Cc:** bradley.strauch@pse.com; Kerry.Kriner@pse.com  
**Subject:** RE: PSE Bellevue portion of Eastside Energize, including Richards Substation project, 17-120556-LB and 17-120557-LO, Critical Areas Land Alteration Use Permit, Notice of Application

Heidi,

Thank you again for sending us the link to documents associated with the Eastside Energize Project for the Bellevue portion. We have reviewed the available information and offer additional comments to those we have already provided:

With respect to the CAR and mitigation plan (our last comment in the email below), it is noted that the plan is preliminary and incomplete. We request an opportunity to review the final mitigation plan before it is approved. For what mitigation is proposed, there is no consideration regarding impacts to future wood recruitment, a key riparian function. The mitigation plan should include details regarding the size, location, and species of trees to be permanently removed within 200 feet of all streams and wetlands. The native trees that are least 4 inches in diameter and within 200 feet of streams should be placed back into the affected streams to create fish habitat. The project should also mitigate for the permanent loss of native tree growth for trees that grow taller than 15 feet naturally and where the ROW overlaps with these 200 foot zones. Since the applicant cannot do so in the corridor, the applicant should be mitigating for this particular impact offsite.

Again, we appreciate the opportunity to comment and ask that Bellevue/applicant provided written responses to all comments we have sent to date.

Best regards,  
Karen Walter  
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division Habitat Program  
39015 172nd Ave SE  
Auburn, WA 98092  
253-876-3116

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From: HBedwell@bellevuewa.gov [HBedwell@bellevuewa.gov]  
Sent: Thursday, November 02, 2017 3:59 PM  
To: Karen Walter  
Cc: bradley.strauch@pse.com; Kerry.Kriner@pse.com  
Subject: RE: PSE Bellevue portion of Eastside Energize, including Richards Substation project, 17-120556-LB and 17-120557-LO, Critical Areas Land Alteration Use Permit, Notice of Application

Sorry. Try this link <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates/>

From: Karen Walter [mailto:KWalter@muckleshoot.nsn.us]  
Sent: Thursday, November 02, 2017 3:38 PM  
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>

Cc: bradley.strauch@pse.com; Kerry.Kriner@pse.com

Subject: RE: PSE Bellevue portion of Eastside Energize, including Richards Substation project, 17-120556-LB and 17-120557-LO, Critical Areas Land Alteration Use Permit, Notice of Application

Heidi,

Thanks for getting back to us quickly about this. The link isn't work and I did check the Energize Eastside website before we made any comments. The materials we are seeking were not available on that website.

Can you resend the permit application link?

Karen Walter

Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division Habitat Program Phillip Starr Building 39015-A 172nd Ave SE Auburn, WA 98092  
253-876-3116

From: HBedwell@bellevuewa.gov<mailto:HBedwell@bellevuewa.gov> [mailto:HBedwell@bellevuewa.gov]

Sent: Thursday, November 02, 2017 2:22 PM

To: Karen Walter

Cc: bradley.strauch@pse.com<mailto:bradley.strauch@pse.com>;

Kerry.Kriner@pse.com<mailto:Kerry.Kriner@pse.com>

Subject: RE: PSE Bellevue portion of Eastside Energize, including Richards Substation project, 17-120556-LB and 17-120557-LO, Critical Areas Land Alteration Use Permit, Notice of Application

Karen,

Thank you for taking the time to respond to the NOA for PSE's Energize Eastside project application. Permit application materials including critical areas reports can be found here<<http://cobamanda/AMANDA5/english/main.jsp?lid=71020016amandai%20&languageType=null&fromLogon=true&sso=true#https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>>

Let me know if you have any additional comments or questions.

[cid:image001.png@01D353F3.A05500C0]

Heidi M. Bedwell

Energize Eastside EIS Project Manager

Environmental Planning Manager, Land Use Division Development Services Department

425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov)<<http://www.bellevuewa.gov>> and

[www.mybuildingpermit.com](http://www.mybuildingpermit.com)<<http://www.mybuildingpermit.com>>

From: Karen Walter [mailto:KWalter@muckleshoot.nsn.us]

Sent: Thursday, November 02, 2017 1:46 PM

To: Bedwell, Heidi <HBedwell@bellevuewa.gov<mailto:HBedwell@bellevuewa.gov>>

Cc: bradley.strauch@pse.com<mailto:bradley.strauch@pse.com>; Kriner, Kerry <Kerry.Kriner@pse.com<mailto:Kerry.Kriner@pse.com>>

Subject: PSE Bellevue portion of Eastside Energize, including Richards Substation project, 17-120556-LB and 17-120557-LO, Critical Areas Land Alteration Use Permit, Notice of Application

Heidi,

We are reviewing Puget Sound Energy's proposed Eastside Energize Project proposal including the new Richards Creek Substation project referenced above. Please note that our previous and outstanding comments as submitted to Bellevue on July 6, 2017 are incorporated by reference. In addition to those outstanding comments from the SEPA process. We offer the following additional comments.

As shown in the project drawings, this project proposes a new culvert on an East Creek tributary as well as relocation of a portion of this stream. We need more information to fully evaluate this proposal. We noted these information needs in the field with PSE, Bellevue, and WDFW earlier this year:

1. Bankfull width measurements used for the culvert design. Per the Preliminary Design Report (Dec 23, 2016 Watershed Company) only measurements downstream of the existing culvert were used to determine average stream bankfull width. This is problematic because the downstream channel is routinely dredged and channelized which do not reflect the natural geomorphic conditions. Areas upstream of the culvert should also be used to develop a new average BFW measurement, then compare this new number to WDFW's regression equation to determine what the expected bankfull would be in this case. It may be that the initial culvert width proposal of 10 feet is correct but should be verified as we have described. To support this work, a bankfull width report should be provided. We provided PSE with an example of such a report as was done for Bellevue's NE 8th Street culvert project on Kelsey Creek.

1. Existing streambed sediment data (i.e. Wolman pebble count data or other appropriate method);

This is important because sediment sizing for the project is based on an incipient motion analysis and not actual streambed sediment measurements to determine the D50 and D100 sizes. The concern is that the proposed streambed material sizes may be too larger (i.e. 12 to 31 inch rock at the high end) compared to existing conditions and the result will be a coarsening of the streambed and reduce its value for salmon habitat.

Also, it does not appear that the addition of wood to the upstream channel was considered as a means to reduce sediment transport issues which may result in a reduction in sediment sizes to be used for this project.

1. Sediment transport analysis

Per the project's 2016 Preliminary Basis of Design Report (Watershed Company), "No field data were available to quantify sediment loadings to the study reach, nor was it in the study scope or timeframe to collect such data. PSE has periodically removed sediment from the outlet of the culverts at the access road to maintain the culverts' capacity. On average, two to three cubic yards of material has been removed one or more times per year. Sediment accumulation at this location has been a problem for 20 years or more.

While the larger culvert should reduce the need for some dredging, the new culvert is being designed to facilitate any dredging needed. As such, the project should include a sediment transport study and a sediment management/monitoring plan to ensure that any dredging needed is the minimal amount needed and that downstream

impacts to fish habitat are appropriate assessed and mitigated. Similar issues arose with the City's Sunset/Richards/East Creek Phase I, II, and III projects and we encourage both Bellevue and PSE to look at the reports and monitoring plans for those projects for similar approaches to address this comment.

1. Filled out Culvert summary form (WDFW 2003)

1. Details regarding how stormwater from the site will be managed for both water quantity and quality treatment and where it will be discharged. This is an important issue as we suspect stormwater will be discharged to the stream and may aggravate existing conditions that result in continued degradation of stream habitat.

1. Technical basis for the proposed wood design, particularly in consideration of stormwater discharges to the stream;

1. As noted in the Preliminary Basis for Design report, there is to be a mitigation plan and CAR analysis documenting proposed impacts, mitigation sequencing, proposed mitigation, and regulatory code compliance that was to be submitted as part of the Critical Areas Land Use Permit (CALUP) and Grading/Building permit application package for the project. Neither document is available via the NOA in the Weekly Permit Bulletin.

We appreciate the opportunity to review this proposal and request written responses to all of our concerns to date. If you have questions, please let me know.

Thank you,  
Karen Walter  
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division Habitat Program Phillip Starr Building 39015-A 172nd Ave SE Auburn, WA  
98092  
253-876-3116

## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Tuesday, November 14, 2017 12:48 PM  
**To:** Kathy Judkins  
**Subject:** RE: Permit comment for Energize Eastside

Corrections noted Kathy.

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**From:** Kathy Judkins [mailto:kathy.judkins@gmail.com]  
**Sent:** Tuesday, November 14, 2017 12:31 PM  
**To:** Bedwell, Heidi  
**Subject:** Re: Permit comment for Energize Eastside

Thank you Heidi. I see that it says Project instead of President in my email ending.  
Also "against this permit" not record.  
Please note these corrections  
See you tonight  
Kathy Judkins

Sent from  
my iPhone X

On Nov 14, 2017, at 11:59 AM, <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)> <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)> wrote:

Hi Kathy,  
Thank you for your message and comments regarding the proposed PSE project. Your comments are included as part of the project file and I have you listed as a party of record. I'm happy to hear you will be attending the meeting this evening. I would encourage you to speak with PSE staff at the meeting as well to explore whether your request for a meeting with them and your neighbors can be accommodated. In any event they will be available this evening to answer questions if you have any.

Thank you again and I look forward to meeting you this evening.  
-Heidi

**Heidi M. Bedwell**  
Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

-----Original Message-----

From: Kathy Judkins [mailto:kathy.judkins@gmail.com]  
Sent: Tuesday, November 14, 2017 11:47 AM

To: Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>

Subject: Permit comment for Energize Eastside

Heidi

I will be at the meeting tonight. I wish to be a party of record for the EE project. I have two poles in my yard at 4324-136th PI SE Bellevue, WA 98006. The proposed Permit states the new pole will be 80 feet tall with 230kwh lines. This will be an extreme danger to my home in the event of an earthquake or other natural disaster. The pole with that height will fall on my home or my neighbor Kelly Xu's home. We also have the Olympic Pipeline in close proximity to this pole.

Also the only access to my home is on the easement drive. I am a 71 year old widow and need access to my driveway. No written details have been mailed to me by Energize the Eastside other than this October 19 Permit Bulletin. I have refused to meet alone with EE people. I asked to have a meeting with my neighbors on the easement and PSE/EE project people but that request was not given.

Please list me as a party of record as being against this record. No permit should be issued, I believe that batteries are the answer.

Thank you

Kathy Judkins

CENSE member

Former Somerset Community Association Project for 3 years Somerset resident since 1983 4324-136th PI SE Bellevue, WA 98006-2237

Sent from

my iPhone X

## Bedwell, Heidi

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**From:** CenturyLink Customer <lizmcgehee@q.com>  
**Sent:** Tuesday, December 12, 2017 11:27 AM  
**To:** Bedwell, Heidi  
**Subject:** new transmission line construction

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Heidi Bedwell:

I am writing concerning the construction of the new substation and transmission line, project 17 120556-LB and 17 120557-LO. I am requesting that any truck traffic on the adjacent pipeline (Seattle water line) be avoided in the winter and spring months when the ground is muddy. My husband and I, along with dozens of my other neighbors, walk this pipeline trail every day, and last winter a truck drove through this trail when it was wet and muddy, leaving deep ruts that later froze so that walking this trail was difficult. Some of those ruts are still there. The trail is quite hard and stable in the summer and early fall, so traffic during those months would have less impact. Thank you for your consideration.

Sincerely,  
Liz McGehee

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:34 AM  
**To:** Bedwell, Heidi  
**Subject:** Re: Lauckhart Comments on PSE Application Supporting Attachments Nos. 12 through 17  
**Attachments:** Supporting Attachment 12.pdf; Supporting Attachment 13.pdf; Supporting Attachment 14.pdf; Supporting Attachment 15.pdf; Supporting Attachment 16.pdf; Supporting Attachment 17.pdf

Ms Bedwell-

Supporting Attachments 12, 13, 14, 15, 16, and 17 re email below.

Richard Lauckhart

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:19 AM  
**To:** hbedwell@bellevuewa.gov  
**Subject:** Lauckhart Comments on PSE Application for a CUP re Energize Eastside (File # 17-120556-LB)

Ms Bedwell-

You have advised me that Individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) to be a party of record for the CUP/CALUP applications.

By this email I am formally submitting my written comments. See attached. Note that my comments also refer to 17 Supporting Attachments. I will be submitting those 17 attachments in separate emails that refer to these comments because of the size limitation on email with attachments.

Please include the attached email and the related 17 Supporting Attachments (coming in separate emails) in the record for this CUP proceeding.

My names is: Richard Lauckhart  
My address is: 44475 Clubhouse Drive, Davis, California 95618  
My email address is: lauckjr@hotmail.com

Richard Lauckhart  
Energy Consultant  
Commenting on behalf of PSE home owners who live on the East Side  
Former VP at Puget

## **Supporting Attachment No. 12**

To Comments made by Richard Lauckhart dated December 11, 2017

Document describing the “fatal flaws” in the load flow studies PSE ran in an attempt to justify EE.

August 21, 2017

To: The Washington Utilities and Transportation Commission

Docket UE-160918

submitted by email to records@utc.wa.gov

Re: Documents that PSE erroneously claims prove the need for Energize Eastside

Dear WUTC:

By this letter I am attaching two documents that are relevant to PSE's Integrated Resource Plan ("IRP") currently under scrutiny by the WUTC. These are the documents that PSE claims prove the need for Energize Eastside. The first attached document is the "Eastside Transmission Solutions Report" Updated February 2014. The second attached documents is the "Eastside Needs Assessment Report Transmission System - Executive Summary" dated December 2013. I believe these documents should be on the record in Docket UE-160918 for purposes of examining what is in them.

There are clear problems with each of these PSE documents.

1. The February 2014 "Eastside Transmission Solutions Report"

The February 2014 "Eastside Transmission Solutions Report" refers to load flow studies, each of which load flow study has a fatal flaw. That fatal flaw is that each load flow study includes a requirement that the PSE local transmission system must support a new ability of BPA to move 1,500 MW of power (or more) to or from the Canadian border under all weather and contingency conditions. **See Table 3-1 in the report. These assumptions cause massive flows through the Puget Sound area for power imported from or exported to Canada, depending on the season. I say massive because there are no firm commitments to move anywhere near that amount of inter-regional power by or for anyone. In some cases, this transmitted electricity is five times larger than peak Eastside demand. Non-firm transmission of this magnitude cannot be used to justify a project that is claimed to address only local needs. The northwest grid as a whole was not designed to move this amount of inter-regional power under all weather and contingency conditions. The load flow work performed for the Lauckhart-Schiffman study makes it clear that these massive inter-regional flows being forced on the grid cause significant problems not only on the PSE local system but also on other parts of the grid that would also need to be dealt with. The 2013 ColumbiaGrid "Stressed Load Flow Case" found the same thing.** PSE has been asked how they dealt with these other problems but PSE has not answered. There is no reason that a study of the needs on PSE's local system should reflect these massive inter-regional flows to or from Canada. As a result, all of the load flow studies performed in this February 2014 "Eastside Transmission Solutions Report" are of no use in determining what is needed to provide reliable power to the greater Bellevue area. These studies show overloads on the PSE local system (and other grid problems) that are caused by these massive non-required inter-regional flows to or from Canada. These to/from Canada flow assumptions need to be eliminated for purposes of assessing the transmission needs in the greater Bellevue area. All these load flow studies need to be rerun without these massive inter-regional flows.

The February 2014 "Eastside Transmission Solutions Report" also has a fatal flaw when it assumes during heavy winter load conditions that PSE and SCL generation west of the Cascades was adjusted to fully off. **See paragraph 3.2.9 in the report.** Clearly PSE would not be able to meet its total system peak in the winter if its generation west of the Cascades was fully off. According to PSE's IRP, PSE is "short" by about 2100 MW of having sufficient generation to cover its total system peak load. While that is a

very large “shortage”, it gets even larger (more than 3,500 MW short) under the assumption that PSE’s west of Cascades generation is fully off.

While PSE claims to have modeled an alternative that has more conservation and an alternative to build a “peaker generating plant” in this February 2014 “Eastside Transmission Solutions Report”, the major problems created by their faulty modeling [*of (a) flows to and from Canada and (b) fully turning off PSE’s generation located west of the Cascades*] swamps the impact of these other alternatives and makes all of the studies done for this report of no value.

1. The “Eastside Needs Assessment Report - Transmission System - Executive Summary” dated December 2013.

I provide this document for the record in UE-160918 because it appears to provide an alternative basis for PSE claiming there is a need for their Energize Eastside project. The graphic on page 2 of this document provides what PSE calls “The Problem.” But this graphic is flawed. The “System Capacity” line is the “summer normal” rating of the two remaining 230/115 KV transformers at Talbot Hill and Sammamish after the other two 230/115 KV transformers fail in the N-1-1 Scenario. It should have been the “winter emergency” rating. Also, the load line does not reflect the actual loads on these remaining transformers from the load flow study for this N-1-1 contingency event. In the Lauckhart-Schiffman report I provide the appropriate graphic which is based on load flow study analysis. The Lauckhart-Schiffman corrected graphic shows the Problem would not occur until many years into the future.

#### **Corrected load flow analysis of the Need for Energize Eastside-**

PSE has been aware for some time that it should not have required the flows to and from Canada in their load flow studies. Further, PSE is fully aware that they cannot meet their winter peak loads with their west of Cascades generation fully off. Despite this awareness on the part of PSE, they inexplicably decided not to rerun their load flow models to fix these faulty assumptions.

But there is evidence on the record in UE-160918 as to what would happen if these faulty assumptions are fixed. That evidence is contained in the Lauckhart-Schiffman load flow study report that is included in the record. While PSE has criticized the Lauckhart-Schiffman load flow study report, there is also evidence on the record in the March 28, 2016 “rebuttal letter” that these PSE criticisms are incorrect. The March 28, 2016 rebuttal of the PSE criticisms of the Lauckhart-Schiffman report (included in the record for Docket UE-160918) also develops questions and challenges for PSE to respond to regarding my rebuttal of their criticisms. PSE has never responded to those questions and challenges.

It is clear from the Lauckhart-Schiffman load flow studies that Energize Eastside is not needed in 2018 in order for reliable service to be provided to the greater Bellevue area. If a reliability issue arises after 2018, then the alternatives I described in my August 14, 2017 “Alternatives to Energize Eastside” submittal in Docket No. UE-160918 would need to be analyzed. These alternatives would clearly be better than building Energize Eastside.

Sincerely,

Richard Lauckhart  
Energy Consultant  
Davis, California

On behalf of a large number of citizens that are concerned about transmission matters in the greater Bellevue area.

cc: IRP Advisory Group members

## **Supporting Attachment No. 13**

To Comments made by Richard Lauckhart dated December 11, 2017

Document providing further evidence that the ColumbiaGrid System Assessment write-up stating there exists a Firm Commitment to deliver 1,350 MW of Treaty Power to the Canadian Border is not correct. Includes an email from ColumbiaGrid stating that BPA was the one that told them that such a Firm Commitment exists [even though BPA responded in a Public Record Act request that no such Firm Commitment exists]. ColumbiaGrid explains that it makes no check on what BPA tells them when they write their System Assessment document. They just include the BPA un-validated allegation in their System Assessment write-up. This allegation has subsequently been refuted by BPA in their response to the Public Records Act request

**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](#); [Frankiewicz, 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](#)

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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

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**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



8338 NE Alderwood, STE-140; Portland, OR 97220

***ColumbiaGrid's mission is to improve the planning, expansion, and efficient use of the Northwest Transmission Grid, [www.columbiagrid.org](http://www.columbiagrid.org)***

## **Supporting Attachment No. 14**

To Comments made by Richard Lauckhart dated December 11, 2017

Questions regarding EE for PSE to respond to at their October 5 IRP Advisory  
Group meeting

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 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.

## **Supporting Attachment No. 15**

To Comments made by Richard Lauckhart dated December 11, 2017

One further question for PSE to respond to at their October 5, IRP Advisory Group meeting, i.e. Why has PSE chosen not to re-run their flawed EE load flow studies to fix the flaws?

Michele-

In your recent email 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.*"

On Tuesday September 12, 2017 I sent to you a series of comments and questions on PSE's Draft IRP that I asked that be responded to at the October 5, IRPAG meeting.

By this email I am asking another question that I ask be responded to at the October 5, IRPAG meeting. This question is tied up by the document included in the records for UE-160918 titled "160918 Fatal Flaws in the PSE justification of the need for Energize Eastside.pdf" posted on the WUTC web site on August 21,2017.

The question is:

**PSE has been aware for some time that it should not have required the flows to and from Canada in their load flow studies. Further, PSE is fully aware that they cannot meet their winter peak loads with their west of Cascades generation fully off. That being the case, why has PSE not rerun the load flow studies to correct these flaws in the studies they ran to attempt to show the need for Energize Eastside?**

\*\*\*\*\*

**I look forward to getting a response to this question (and the other questions, challenges and concerns I provided in my September 12,2017 email) 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.

## **Supporting Attachment No. 16**

To Comments made by Richard Lauckhart dated December 11, 2017

Document explaining the difference between (1) a WECC Path Rating and (b) a Firm Commitment for transmission delivery. Explains that PSE is erroneously treating the WECC Path Rating for the Northwest to Canada path as if it were a “Firm Commitment” in its load flow studies allegedly showing the need for EE. This treatment of WECC Path Ratings is wrong. PSE needs to re-run their load flow studies allegedly showing the need for EE to eliminate these non-required inter-regional flows.

October 1, 2017

To: The Washington Utilities and Transportation Commission

Docket UE-160918

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

Re: The Difference between a WECC Path Rating and a Firm Commitment

Dear WUTC:

On August 21, 2017 I sent to you a document Re: “Documents that PSE erroneously claims prove the need for Energize Eastside.” In that document I pointed out that PSE load flow studies all had a fatal flaw. I indicated that the fatal flaw is that each load flow study includes a requirement that the PSE local transmission system must support a new ability of BPA to move 1,500 MW of power (or more) to or from the Canadian border under all weather and contingency conditions.

By this letter I clarify that it appears that PSE apparently based their flow assumptions to and from Canada on the WECC Path Rating for their Path 3: Northwest to Canada. PSE seems to be treating these WECC Path ratings as if they were Firm Commitments. That is a mistake.

WECC Path Ratings are a far different thing than a Firm Commitment. A WECC Path Rating is very similar to what other parts of North America call a “System Operating Limit” (SOL). The System Operating Limit is the maximum amount of power that can be put across a path no matter how favorable the conditions are. That value is much higher than a Firm Commitment value since Firm Commitments need to be honored under adverse conditions.

The Path Rating concept, and its difference from a Firm Commitment, has been clearly articulated by the Nevada Commission as they studied existing transmission grid in the state of Nevada. See the document at the link below.

[http://energy.nv.gov/uploadedFiles/energynvgov/content/NEAC\\_FinalRpt-Section4-StrategicTransmissionDiscussion.pdf](http://energy.nv.gov/uploadedFiles/energynvgov/content/NEAC_FinalRpt-Section4-StrategicTransmissionDiscussion.pdf)

Section 4.3.2 of that report provides the following information: [I have emphasized key statements in this information by underlining and bolding the text]

The WECC Glossary Proposal defines a “Transfer Path” as:

*An element or group of elements (transmission lines, transformers, series capacitors, buses or other pieces of electrical equipment interconnecting control areas or parts of a control area) over which a Schedule can be established.*

On a yearly basis, the WECC publishes the WECC Path Rating Catalog. It is a collection of discussions on individual path ratings within the WECC system. As defined within the Catalog, a “Path” is composed of an individual transmission line or a combination of parallel transmission lines. A “Transfer Path” may be

composed of transmission lines between control areas or internal to a control area, or a combination of both.

**The path rating for most paths is dependent on a multitude of electrical system conditions. If the system conditions are favorable, the path rating will increase. Unfavorable system conditions tend to result in a decreased path rating.** As a result, path ratings typically vary over a range, from a maximum value to a minimum value. **In normal WECC parlance, path ratings fall into one of three categories: non-simultaneous, simultaneous, and/or firm. Non-simultaneous path ratings represent the maximum path rating for the most favorable combination of system conditions. From a probabilistic perspective, only rarely are all the system conditions optimum, so at any point in time, the prevailing “operational” path rating is almost always less than the non-simultaneous rating. The path ratings listed in the WECC Path Rating Catalog are non-simultaneous “maximum” path ratings.**

The last sentence in this writing is the key one for purposes of running load flows to demonstrate the need for Energize Eastside. It says **“The path ratings listed in the WECC Path Rating Catalog are non-simultaneous “maximum” path ratings.”** Clearly for a WECC load flow study this path rating can only be accomplished when system conditions are optimum. It is not a Firm Commitment.

The information provided at the link above goes on to clarify as follows:

Firm path ratings represent the minimum value of the range of a path rating. Firm transmission rights are transmission rights guaranteed to be useable, with the possible exception of transmission line outages or other unusual circumstances or emergency conditions. Transmission providers can sell firm transmission rights up to this value, since the operational path rating is at or greater than this value virtually 100% of the time.

PSE is treating the WECC Path Rating for the Northwest to Canada path as if it is a Firm Commitment. Clearly it is not. Clearly the WECC Path Ratings for Path 3: Northwest to Canada can only be met under the **“most favorable of combination of system conditions.”**

When PSE studies the needs of its local system by assuming (a) a very cold winter condition, and (2) most all of its Puget Sound Area generation off line then PSE is not studying “the most favorable of combination of system conditions.” In fact, PSE is studying a very unfavorable combination of system conditions. Since there are no Firm Commitment commitments to move anywhere near that amount of inter-regional power assumed by PSE in its load flow studies by or for anyone, their load flow studies cannot legitimately include these inter-regional transfers. These PSE load flow studies all need to be rerun without these non-required inter-regional flows. **It is completely inappropriate for PSE to treat WECC Path Ratings for the Northwest to Canada path as if they were Firm Commitments.**

PSE claims that FERC has ruled the PSE properly dealt with Energize Eastside and ColumbiaGrid. But we need to be clear on what FERC said. FERC points out that if a utility like PSE intends to make improvements to its local transmission system, then PSE would need to have ColumbiaGrid study to assure that the proposed PSE improvement (e.g. Energize Eastside) does not adversely impact a neighboring utility. The first step in that process would be for ColumbiaGrid to determine what the grid could do without Energize Eastside. Then add Energize Eastside to the study to see if the grid can no longer do what it was able to do without Energize Eastside. In this case, **there has been no**

**demonstration that the grid can meet WECC Path 3 Northwest to Canada path rating levels under these adverse system conditions of very cold winter weather and PSE Puget Sound Area generation off line *without* Energize Eastside. There is no need for PSE to demonstrate that these Path Ratings can be met *with* Energize Eastside since the grid cannot meet these Path Ratings without Energize Eastside.** (It is difficult to imagine how the addition of Energize Eastside could adversely impact the ability of BPA to deliver power to or from Canada. There is no requirement that Energize Eastside *improve* the ability of BPA to move power to or from Canada.)

Sincerely,

Richard Lauckhart  
Energy Consultant  
Davis, California

On behalf of a large number of citizens that are concerned about transmission matters in the greater Bellevue area.

cc: IRP Advisory Group members

## **Supporting Attachment No. 17**

To Comments made by Richard Lauckhart dated December 11, 2017

Comments Lauckhart made at the October 5, 2017 PSE IRP Advisory Group meeting

**Comments made by Richard Lauckhart at PSE's October 5, 2017 IRP Advisory Committee meeting**

My name is Richard Lauckhart. I have worked in the electric power industry for 40+ years. For 22 of those years I worked for Puget, most notably 5 years as Vice President of Power Planning. Since leaving Puget, I spent the rest of my career as a consultant in the electric power industry.

Over the past two years, I have spent considerable time and energy investigating PSE's proposed Energize Eastside project. I have investigated this project on a deeply technical level, for no compensation whatsoever, because I am compelled by my conscience.

Based on my thorough investigation, I must conclude that the Energize Eastside project is not needed. I have placed 16 documents on the record in this PSE IRP Docket No. UE-160918 that lead me to this conclusion. I am attaching to these comments a listing of those 16 documents that includes the date when the document was filed with the WUTC and a brief description of what is in each document.

In general these documents demonstrate that the load flow studies and other analyses that PSE used to justify the Energize Eastside project are flawed and they need to be redone to fix these flaws.

I provided on July 25, 2017 the Lauckhart-Schiffman load flow study that has fixed these flaws. The Lauckhart-Schiffman load flow study demonstrates that if these flaws are fixed, then Energize Eastside is not needed now or any time soon.

I also provided via an email filed on August 14, 2017 a document that lists alternatives to Energize Eastside that would be better if at some point in time there is a need to address a reliability problem on the eastside. These include more DSM, batteries, 230/115 transformer at Lake Tradition, Seattle City Light line option, etc.

The September 12, 2017 document I provided for the record includes seven questions under item number 2 that I believe are crucial to understand the need for this project. Yesterday, PSE responded with what they called "high-level responses" that did not answer the seven questions. I believe PSE needs to answer these questions.

PSE claims that Canadian transfers and generation dispatch have no relevance to the need for Energize Eastside. To prove that they are irrelevant, PSE should rerun the load flow studies without inter-regional flows and with local generation operating. The Lauckhart-Schiffman load flow study found there is no transformer capacity issue or other reliability problem, when these inputs are correct.

**Unless PSE reruns its load flow models and makes them available for inspection for people like myself that have CEII clearance from FERC, the only correct load flow model on the record regarding the need for Energize Eastside is the Lauckhart-Schiffman load flow study. The Lauckhart-Schiffman study is the only one that uses the load forecast PSE gave to the Western Electricity Coordinating Council, correct inter-regional flows, and appropriate generation dispatch. That study concludes that Energize Eastside is not needed now or any time soon.**

**Documents provided by Richard Lauckhart for the record in PSE IRP Docket No. UE-160918**  
**[Related to the need for Energize Eastside (EE)]**

<u>Date document filed</u>	<u>Comment Description.....</u>
July 25, 2017	<p>Several documents filed as follows:</p> <ul style="list-style-type: none"> <li>1-Lauckhart_Schiffman Load Flow study showing EE is not needed (includes my resume)</li> <li>2- Rebuttal to PSE criticisms of Lauckhart-Schiffman including Q's and challenges to PSE</li> <li>3-Part 3: Email demonstrating that there is no Firm Requirement to deliver Canadian Entitlement Power to the Canadian Border</li> <li>4-Copy of "Agreement on Disposals of the Canadian Entitlement within the United States" covering the years 1998-2024 referred to in the email above</li> <li>5-Blowing the Whistle Slide show questioning PSE's motive and proof of the need for EE</li> <li>6-Backstory on PSE's motive to build EE</li> <li>7-Setting the record straight on EE Technical Facts</li> </ul>
July 31, 2017	Comments I made to ColumbiaGrid pointing out the error in their System Assessment write-up regarding the need to deliver 1,350 MW of Treaty power to the Canadian border
August 2, 2017	Evidence that ColumbiaGrid had no substantive role in determining the need for EE
August 14, 2017	<p>Email describing alternatives that would be better than EE if in the future there is a need for reliability improvements on the Eastside</p> <p>Comments demonstrating that the Seattle City Light line is a legitimate and better alternative to EE if there is a need and PSE chooses to use the FERC Open Access Transmission Tariff (OATT) rules available to them in order to enable this option to happen</p>
August 21, 2017	Document describing the "fatal flaws" in the load flow studies PSE ran in an attempt to justify EE. Documents filed this day also include the documents that PSE has alleged show the need for EE because these documents are referenced in the "fatal flaws" write-up
August 22, 2017	Document providing further evidence that the ColumbiaGrid System Assessment write-up stating there exists a Firm Commitment to deliver 1,350 MW of Treaty Power to the Canadian Border is not correct. Includes an email from ColumbiaGrid stating that BPA was the one that told them that such a Firm Commitment exists [even though BPA responded in a Public Record Act request that no such Firm Commitment exists]. ColumbiaGrid explains that it makes no check on what BPA tells them when they write their System Assessment document. They just include the BPA un-validated allegation in their System Assessment

write-up. This allegation has subsequently been refuted by BPA in their response to the Public Records Act request

- Sept 12, 2017 Questions regarding EE for PSE to respond to at their October 5 IRP Advisory Group meeting
- Sept 14, 2017 One further question for PSE to respond to at their October 5, IRP Advisory Group meeting, i.e. Why has PSE chosen not to re-run their flawed EE load flow studies to fix the flaws?
- October 1, 2017 Document explaining the difference between (1) a WECC Path Rating and (b) a Firm Commitment for transmission delivery. Explains that PSE is erroneously treating the WECC Path Rating for the Northwest to Canada path as if it were a "Firm Commitment" in its load flow studies allegedly showing the need for EE. This treatment of WECC Path Ratings is wrong. PSE needs to re-run their load flow studies allegedly showing the need for EE to eliminate these non-required inter-regional flows.
- October 6, 2017 Comments Lauckhart made at the October 5, 2017 PSE IRP Advisory Group meeting
- List of documents that I placed on the record in UE-160918 that lead me to conclude that Energize Eastside is not needed now or any time soon.

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:26 AM  
**To:** Bedwell, Heidi  
**Subject:** Re: Lauckhart Comments on PSE Application Supporting Attachments Nos. 2, 3, and 4  
**Attachments:** Supporting Attachment 2.pdf; Supporting Attachment 3.pdf; Supporting Attachment 4.pdf

Ms Bedwell-

Supporting attachments 2, 3, and 4 re email below.

Richard Lauckhart

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:19 AM  
**To:** hbedwell@bellevuewa.gov  
**Subject:** Lauckhart Comments on PSE Application for a CUP re Energize Eastside (File # 17-120556-LB)

Ms Bedwell-

You have advised me that Individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) to be a party of record for the CUP/CALUP applications.

By this email I am formally submitting my written comments. See attached. Note that my comments also refer to 17 Supporting Attachments. I will be submitting those 17 attachments in separate emails that refer to these comments because of the size limitation on email with attachments.

Please include the attached email and the related 17 Supporting Attachments (coming in separate emails) in the record for this CUP proceeding.

My names is: Richard Lauckhart  
My address is: 44475 Clubhouse Drive, Davis, California 95618  
My email address is: lauckjr@hotmail.com

Richard Lauckhart  
Energy Consultant  
Commenting on behalf of PSE home owners who live on the East Side  
Former VP at Puget

## **Supporting Attachment No. 2**

To Comments made by Richard Lauckhart dated December 11, 2017

Rebuttal to PSE criticisms of Lauckhart-Schiffman

(including Q's and challenges to PSE)

March 28, 2016

Bellevue City Council  
450 110<sup>th</sup> Ave. NE  
P.O. Box 90012  
Bellevue, WA 98009

Dear Mayor Stokes and Councilmembers,

On March 23, PSE sent you a letter criticizing the Lauckhart-Schiffman Load Flow Study and making other inaccurate statements regarding needs and requirements for the company's Energize Eastside project. As the author of the Lauckhart-Schiffman report and a 22-year veteran of Puget Power, the citizen group CENSE asked me to respond.

There are three main areas of disagreement:

1. We disagree that PSE is required to support the export of 1,500 MW to Canada.
2. We disagree with the characterization of the project as upgrading the "backbone of the Eastside."
3. We disagree that other studies have sufficiently addressed the need for the project.

I will cover these points and some of the other lesser disagreements below. I have highlighted and numbered specific questions for PSE that we ask PSE to answer.

### Where does the requirement to export 1,500 MW to Canada originate?

PSE's letter states, "Flows to and from Canada for planning purposes are set by the regional planning authority (ColumbiaGrid) in conjunction with other regional utilities."

This statement is incorrect for the following reasons:

- ColumbiaGrid does not have the authority to require exports of this magnitude at all times of year and under all operating conditions. While ColumbiaGrid has written that NERC Reliability Standards require 1,500 MW to flow to Canada, there is no evidence that such a requirement exists in the NERC Reliability Criteria. There is also no requirement in ColumbiaGrid's Planning and Expansion Functional Agreement.

**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.**

- CENSE asked FERC to require ColumbiaGrid to run PSE's load flow studies in a transparent fashion with stakeholder input. FERC rejected this request, because PSE did not submit the project as a part of a Regional Transmission Plan, therefore FERC does not have jurisdiction over it. If FERC does not have jurisdiction, neither does ColumbiaGrid. Neither of these organizations can require PSE ratepayers to pay for a line that supports delivery of 1,500 MW to Canada, when smaller and less expensive solutions are possible without this export requirement.

- Any “Firm Commitment” to move 1,500 MW of power to Canada requires a written contract. PSE has refused to show any contract demonstrating such a requirement exists, but instead referred us to BPA. BPA is the only utility in Washington State that has power lines that can transmit power to Canada. In response to a Freedom of Information Act request, BPA has stated it has no such contract.

**2. We challenge PSE, ColumbiaGrid, or BPA to produce a contract showing a Firm Commitment to deliver 1,500 MW to Canada.**

- The Western Electricity Coordinating Council (WECC) provides Base Cases for utilities and stakeholders to use for load flow studies. The WECC Base Case for heavy winter consumption in 2018 specifies only 500 MW flowing to Canada. PSE does not dispute this fact. PSE has stated that it uses WECC Base Cases as the basis for its studies. If PSE ran a load flow study for the winter of 2018 that had 1,500 MW flowing to Canada, then engineers running the simulation must have increased the flow to Canada by 1,000 MW.

**3. We challenge PSE to prove that they did not increase flow to Canada relative to the WECC Base Case.**

- Lauckhart and Schiffman tried to duplicate PSE’s work by starting with the WECC Base Case for heavy winter consumption in 2018. We modified the Base Case by increasing flow to Canada from 500 MW to 1,500 MW. The simulation identified a problem with lines that carry electricity across the Cascade mountain range from central Washington to the Puget Sound region. Unless PSE has a specific solution to this problem, it invalidates the assumptions that underlie the Energize Eastside project.

**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.**

- We have asked for PSE’s study data so we can determine whether PSE solved this problem or simply ignored it. PSE has refused to share the data. **Until PSE provides these files, PSE’s load flow studies should not be considered adequately vetted for purposes of approving or permitting the Energize Eastside project.**

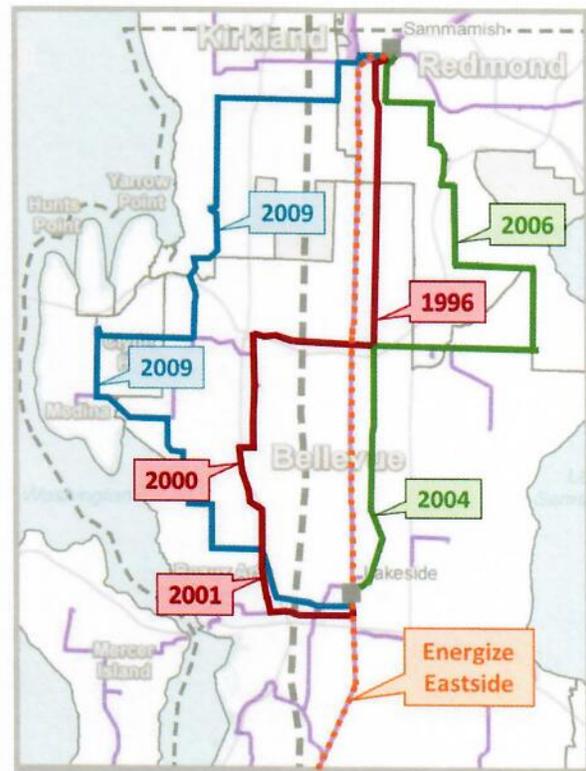
## Is the project needed to upgrade the “backbone of the Eastside?”

PSE describes the Energize Eastside transmission lines as the “backbone of the Eastside” that hasn’t been upgraded for 60 years. This is a marketing ploy that distorts the truth. These transmission lines might have been a backbone some decades ago when they were the only north-south transmission lines through Bellevue. However, it is my understanding that in the last 20 years, PSE has constructed numerous transmission line segments, completing three additional north-south transmission lines through Bellevue. These are shown with dates of completion in the map shown here that was included in the Draft EIS.

The red transmission line between the Lakeside and Sammamish substations was completed in 2001. The green line was completed in 2006, and the blue line was completed in 2009. This represents a 250% increase in north-south capacity during the last 15 years. PSE has not been sitting on its hands, as its public statements imply.

These new lines provide enough capacity and redundancy that PSE says the two Energize Eastside lines could be removed for 9 months of the year with no impact on system reliability. In fact, I believe they could be removed entirely if they weren’t needed to transmit regional electricity during periods of high local demand.

The transmission of regional electricity is primarily an economic transaction, not a reliability requirement. These transactions benefit BPA, which receives income from such transfers. To the extent that this project benefits regional transmission capacity, BPA should be contributing funds to the project. The burden should not be placed solely on PSE’s ratepayers.



## Did Lauckhart-Schiffman study stresses correctly?

PSE faults Lauckhart-Schiffman for reviewing “only limited N-0 and N-1-1 contingencies” rather than “variations of N-0, N-1, N-1-1, and N-2.” This statement is incorrect. Our analysis evaluated N-0, N-1 and N-1-1 contingencies. For this type of study an N-2 contingency is the same as an N-1-1 contingency. Further, these contingencies are irrelevant until we address the fundamental questions of whether 1,500 MW must be exported to Canada and whether the regional grid can handle that.

## Did Lauckhart-Schiffman use correct growth projections?

PSE is vague about how they calculate a 2.4% annual rate of demand growth based on significantly lower rates of population and economic growth for the Eastside. PSE frequently makes the case they repeat in their letter, “Projections ... show a 2.4% growth rate for the Eastside – growth you can see

when you look out your window or walk down the streets of Bellevue.” PSE is using a qualitative argument, when we want quantitative confirmation. No independent consultant has independently verified the accuracy of PSE’s projections.

Lauckhart and Schiffman calculated the rate of growth from data PSE provided to WECC. By comparing the numbers PSE provided for loads on Eastside substations in the 2014, 2018, and 2020 WECC Base Cases, we calculated a growth rate of 0.5%.

**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.**

### Did Lauckhart-Schiffman study local generation plants correctly?

PSE’s letter says, “It doesn’t matter which generators are turned on or off when analyzing problems with the Eastside transmission delivery system.” We disagree. These generators might not directly serve Eastside load, but turning them off forces more power to flow through the transformers that PSE says are overloading in its scenario. If the generators don’t matter, PSE shouldn’t object that we turned them on in the Lauckhart-Schiffman study (just like was done in the WECC Base Case).

One fact is beyond dispute. Turning off 1,400 MW of generation in the Puget Sound area would require that amount of electricity to be imported from central Washington (since PSE insists that it can’t come from Canada). We believe that the transmission lines carrying electricity from central Washington do not have sufficient capacity to deliver that additional power along with 1,500 MW to Canada. Once again, this is an unrealistic scenario.

**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.**

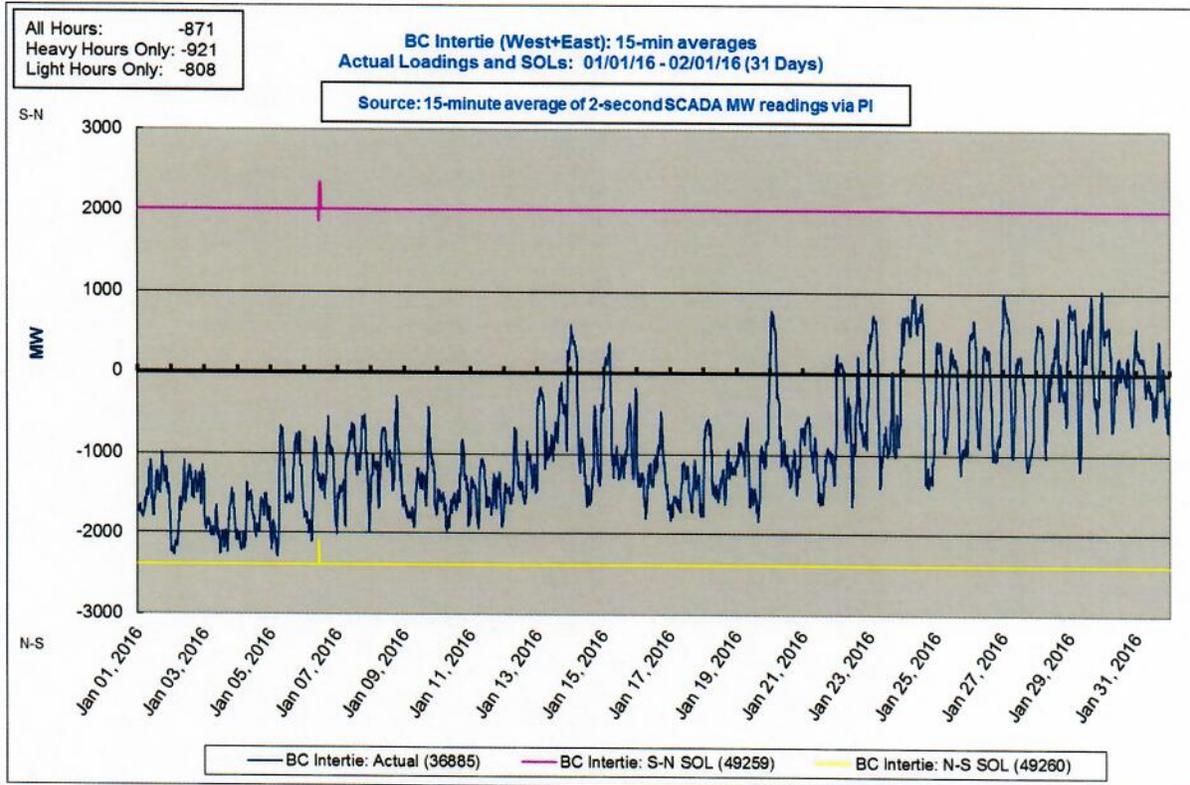
### What criteria should be used in planning?

PSE says, “Lauckhart and Schiffman are making an observation regarding how an electric system operator may potentially operate the system in an emergency situation, which is irrelevant to planning.” This misstates our objection. We say that the system cannot be operated in the scenario PSE is proposing without causing blackouts in the Puget Sound Region. It is reasonable and prudent to consider how grid operators would respond in that scenario. PSE argues that it is acceptable to justify their plan for the Eastside using a scenario that would cause blackouts elsewhere in the region.

### Do other studies prove the need for Energize Eastside?

PSE likes to quote the conclusion of the study performed by Utility System Efficiencies, while ignoring the most stunning finding of the USE report. On page 65 of that report, USE found that 4 of the 5 overloads on PSE’s system disappear if electricity exports to Canada are reduced. The remaining overload is so minor that it could easily be remedied with a relatively inexpensive upgrade to a single transformer or simply by turning on more Puget Sound Area generation.

PSE will argue that reducing power flow to Canada is not an option. Let's test that theory. In January 2016, the Puget Sound region had a couple of weeks of very cold weather. Was BPA transmitting 1,500 MW to Canada during this time? We can check a publicly available website maintained by BPA to find out:



The dark blue line shows energy transfers between the Puget Sound and British Columbia updated every 15 minutes during the month of January 2016. When the line is below the axis, electricity is flowing from Canada to the US, as it did for most of the first three weeks in January. As temperatures warmed, electricity began flowing back and forth between the two countries (but still mostly southward).

This graph is significant, because energy flowing from Canada reduces stress on the transformers that PSE says are vulnerable to overloads during heavy winter peak demand. There is no evidence during the past decade that large amounts of electricity flow northward during very cold winter weather. If PSE says there is a contractual obligation to transmit large amounts of electricity to Canada at all times and under all conditions, why wasn't this done in January 2016?

**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*.**

## Summary

We repeat our questions and challenges here to provide a clear record of what we're asking:

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*.

Sincerely,



Richard Lauckhart  
CENSE consultant

Cc: Booga Gilbertson, PSE  
Brad Miyake  
Kate Berens

## **Supporting Attachment No. 3**

To Comments made by Richard Lauckhart dated December 11, 2017

Email demonstrating that there is no Firm Requirement to deliver Canadian  
Entitlement Power to the Canadian Border

# Additional comments on Columbia Grid Draft 2017 System Assessment

Richard

Mon 7/24/2017 11:01 PM

To: paul@columbiagrid.org <paul@columbiagrid.org>;

Bcc: Don Marsh <don.m.marsh@hotmail.com>; Christina Aron-Sycz <aronsycz@gmail.com>; Larry Johnson <larry.ede@gmail.com>; Warren Halvorsen <whalvrsn1@frontier.com>; hansennp@aol.com <Hansennp@aol.com>; Russell Borgmann <rborgmann@hotmail.com>;

 2 attachments (3 MB)

March 1999 amendment\_Columbia River Treaty Agree Copy.pdf; Disposal Agreement re Canadian Entitlement.pdf;

Dear ColumbiaGrid/Paul-

Last Friday June 21, 2017 I sent you an email with attached letter providing comments/questions on the ColumbiaGrid Draft 2017 System Assessment. By this email and its attachments I am supplementing those comments. Please additionally include this email with its attachments in the formal comments on the ColumbiaGrid Draft 2017 System Assessment.

In my June 21, 2017 delivery on this matter at my point number five I pointed out that our research cannot find that there is a Firm Commitment on the part of BPA or anyone else in the United States to deliver Canadian Entitlement power to the Canada border. I asked that you provide any evidence that ColumbiaGrid has that there is a Firm Commitment to deliver Canadian Entitlement power to the Canadian border. To date you have provided no such evidence.

By this email and its attachments I point out that there is clear evidence that there is **no** Firm Commitment to deliver Canadian Entitlement (e.g. 1,350 MW) to Canada. That evidence is contained in the attached 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. I have highlighted the relevant sections of this Agreement.

As can be seen in this document, the original plan (in the 1960's) for delivering Entitlement Power to Canada was for those deliveries to be made at Oliver, British Columbia. That plan which would have required the building of transmission lines from two directions to Oliver, BC was put on hold for 30 years when Canada sold its share of Canadian Entitlement power for 30 years to entities in the United States. This Oliver delivery point plan would have required BPA to build new 500 KV transmission from near Grand Coulee Dam north to Oliver, BC. BC Hydro would need to build 500 KV from Oliver, BC to the vicinity of Vancouver, BC. Building these lines would have been a major and expensive undertaking.

When those 30 year sales of Canadian Entitlement power to US entities was about to expire in the last 1990's, once again the parties were faced with building Transmission lines to Oliver, BC. This 1999 Entity Agreement eliminated the obligation of both parties to build those lines. This 1999 Entity agreement refers to the similarly dated 1999 **Disposal Agreement** (also attached to this email). The Disposal Agreement allows for Canada to sell its share of Treaty power within the United States on a short term basis (i.e. having that power delivered from the generating points on the Columbia River to delivery points in the United States where Canada [i.e. BC Hydro] has

DSD 004595

made arrangements from day to day to sell the power to a U.S. entity). This power never needs to be delivered to the Canadian Border.

The Entity Agreement states that if Canada would like the power to be delivered to the Canadian Border at any particular point in time (rather to some US located entity), then since the lines to Oliver have not been built, the power would be delivered to existing connections points at Blaine and Nelway, **but only if there is available transmission capacity to those points**. See paragraph 3 in the Entity Agreement...note in particular the paragraph starting with "Subject to paragraphs 8 through 11..." Note paragraph 9 states that if the United States Entity is not able to purchase Firm Transmission to Blaine and Nelway, then it may be that the power can not be delivered to those points because of transmission constraints. Under paragraph 9 (b), if Canada decides later that it wants Firm Transmission to the Canadian Border, then Canada would need to request that the US entity procure the needed delivery capability (e.g. through construction or otherwise) and if Canada is willing to pay certain amounts for the US procuring the capability, then the Deliveries could be made under a Firm Commitment to Canada. Canada never made such a request. BPA responded in to a Public Record Act request that they never received such a request from Canada. Therefore the treaty documents provide clear evidence that the deliveries to Blaine and Nelway are not Firm Commitments. Meaning that deliveries of Canadian Entitlement power can not be made to these points under all weather and contingency conditions.

BPA has known since at least 1999 (when the treaty was amended) that it would not be able to deliver Canada's share of downstream benefits to Canada under all weather and contingency conditions. In 2009, Puget Sound Area Study Group members developed a draft report entitled "Assessment of Puget Sound Area/Northern Intertie Curtailment Risk." That study describes certain system operating plans that could reduce the Curtailment Risk in the south-to-north direction on the tie to Canada.

If there had been in place a Firm Commitment in 1999 to deliver Canadian Entitlement power to the Canada border on a Firm Basis, then studies would have been done back in 1999 (or before) to determine what construction would be necessary to provide that Firm Commitment. Facilities would have been built long ago. Canada would have insisted on it. No one would have waited until PSE had some local needs in the year 2018 or later.

Please correct the erroneous language in your Draft 2017 System Assessment to make it clear that there is no Firm Commitment to deliver 1,350 MW of Canadian Entitlement power to the Canadian border.

I would be happy to meet with you to discuss these matters or have a discussion over the phone if you wish to have a discussion about this evidence.

Richard Lauckhart  
Energy Consultant  
Davis, California

Commenting on behalf of a large number of interest citizens in the Puget Sound Area.

## **Supporting Attachment No. 4**

To Comments made by Richard Lauckhart dated December 11, 2017

Copy of "Agreement on Disposals of the Canadian Entitlement within the United States" covering the years 1998-2024 referred to in Supporting Attachment No. 3

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

WHEREAS:

- A. Canada and the United States are parties to the Treaty; and
- B. The Canadian Entity (being, for purposes of this Agreement, British Columbia Hydro and Power Authority) and the United States Entity (collectively, the "Entities") are designated as the entities under Article XIV of the Treaty for certain purposes under the Treaty; and
- C. Pursuant to Article V(2) of the Treaty, the United States is obligated to deliver to Canada the Canadian Entitlement at a point on the Canada-United States boundary near Oliver, British Columbia, or at such other place as the Entities may agree upon; and
- D. Pursuant to Article VIII(1) of the Treaty, portions of the Canadian Entitlement may be disposed of within the United States with the authorization of Canada and the United States evidenced by an exchange of notes; and
- E. By exchange of notes dated September 16, 1964, Canada and the United States authorized the sale of the Canadian Entitlement within the United States of America pursuant to Article VIII of the Treaty; the sale expires in steps occurring March 31, 1998, March 31, 1999, and March 31, 2003; and
- F. By an exchange of notes (the "1999 Exchange of Notes"), Canada and the United States have authorized or will authorize disposals of all or portions of the Canadian Entitlement within the United States pursuant to Article VIII of the

Treaty with delivery and other arrangements for such disposals to be made in accordance with the Disposal Agreement; and

- G. Pursuant to Article XIV(2)(j) of the Treaty, the Entities have the powers and duties to make appropriate arrangements for delivery of the Canadian Entitlement including such matters as load factors for delivery, times and points of delivery, and calculation of transmission loss; and
- H. The Entities wish to enter into this Agreement for the delivery of the Entitlement Delivery Amount at points on the Canada-United States boundary other than a point near Oliver, British Columbia, and to resolve certain matters pertaining to scheduling and calculation of transmission loss.

NOW THEREFORE in accordance with the Treaty the Entities agree as follows:

1. This Agreement shall be effective on the later of the date of execution or the effective date of the Disposal Agreement and shall continue in full force and effect until 2400 hours on September 15, 2024. All then outstanding obligations shall continue until satisfied. Execution of this Agreement supersedes and terminates 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 November 20, 1996, and the Entity Agreement of the same name, dated March 26, 1998, but never having reached its effective date.
2. For the purpose of this Agreement:
  - (a) "Annual U.S. Obligation" for any year shall mean the Transmission Cost that the United States Entity would incur to deliver the relevant amounts of Entitlement Delivery Amount at the Points of Delivery if the amounts of Entitlement Delivery Amount had previously been continuously delivered at the Points of Delivery pursuant to this Agreement; and
  - (b) "Bonneville" means the Administrator of the Bonneville Power Administration not acting in its capacity as or on behalf of the United States Entity; and
  - (c) "Canadian Entitlement" at any time shall mean the downstream power benefits to which Canada is entitled at that time as described in Article V(1) and Article VII of the Treaty and determined in accordance with the Treaty; and
  - (d) "deliver" shall mean make available in the case of electrical capacity or deliver in the case of electrical energy, or both, as the context may require and derivatives of "deliver" shall have corresponding meanings; and
  - (e) "Disposal Agreement" shall mean the "Agreement on Disposals of the Canadian Entitlement within the United States for April 1, 1998 through

**September 15, 2024" between British Columbia ("British Columbia") and Bonneville Power Administration acting on behalf of the United States Entity; and**

- (f) "Entitlement Delivery Amount" at any time shall mean the Canadian Entitlement less the amount described in Article V(2)(a) and Article V(2)(b) of the Treaty; and
- (g) "Points of Delivery" shall mean the Blaine No. 1 Point of Delivery, the Blaine No. 2 Point of Delivery, the Nelway Point of Delivery and the Waneta Point of Delivery, each as described in more particularity in Attachment A; and
- (h) "Transmission Cost" for any period shall mean (i) the cost of transmission service, plus (ii) any cost, excluding transmission losses, which is necessarily incurred to deliver Entitlement Delivery Amount for such period, in each case based on published prices, plus (iii) any costs of redispach, construction or modification of transmission facilities as determined by the regulatory methodology then applicable to the parties involved; and
- (i) "Treaty" shall mean the "Treaty between Canada and the United States of America relating to cooperative development of the Water Resources of the Columbia River Basin" including its Annexes A and B, signed at Washington, District of Columbia, United States of America on the 17<sup>th</sup> day of January, 1961, and the Protocol, brought into force by exchange of instruments of ratification and an Exchange of Notes on September 16, 1964.

3. Pursuant to Article V(2) and Article XIV(2)(j) of the Treaty, the Entities agree that the places of delivery of the Entitlement Delivery Amount for the period commencing April 1, 1998, and ending at 2400 hours on September 15, 2024, shall be the Points of Delivery. Subject to paragraphs 8 through 11, the United States Entity shall make available, at no cost to Canada imposed in the United States, the Entitlement Delivery Amount capacity at the Points of Delivery in the following amounts:

- (a) 3/14ths at the Nelway Point of Delivery and the Waneta Point of Delivery; and
- (b) 11/14ths at the Blaine No. 1 Point of Delivery and the Blaine No. 2 Point of Delivery.

**Subject to paragraphs 8 through 11**, the United States Entity shall deliver at no cost to Canada imposed in the United States, and the Canadian Entity shall accept, the Entitlement Delivery Amount energy at the Points of Delivery as scheduled by the Canadian Entity pursuant to paragraph 5, up to the capacity amounts referred to in subparagraphs (a) and/or (b) of this paragraph 3.

4. Deliveries of the Entitlement Delivery Amount shall not be interrupted or curtailed except for reasons of uncontrollable force or maintenance and then only on the same basis as deliveries of firm power from the Federal Columbia River Power System to Pacific Northwest customers of Bonneville or any successor. To the extent the Entities are unable to effect delivery of that part of the Entitlement Delivery Amount referred to in subparagraph 3.(a) to the Points of Delivery so specified in that subparagraph, the part not able to be so delivered shall be added to the amount to be delivered to the Points of Delivery so specified in subparagraph 3.(b). Notwithstanding the foregoing, the Entities agree that at any time, and from time to time, the portions of the Entitlement Delivery Amount to be delivered to the respective Points of Delivery specified in subparagraphs 3.(a) and 3.(b) may be changed temporarily for operational reasons upon agreement by the Columbia River Treaty Operating Committee representing the Entities.

5. During the period commencing on April 1, 1998, and ending on September 15, 2024, the Canadian Entity shall schedule the Canadian Entitlement pursuant to this Agreement and the scheduling provisions set forth in Attachment B. The Canadian Entity may appoint a suitably qualified "Scheduling Agent" to actually perform the scheduling duties required under this Agreement, subject to the United States Entity's approval, which shall not be unreasonably withheld.

6. During the period commencing on April 1, 1998, and ending on September 15, 2024, the transmission loss referred to in Article V(2)(a) of the Treaty shall be calculated as 3.4% of the Canadian Entitlement energy from which first has been subtracted the amounts described in Article V(2)(b) disposed of within the United States pursuant to the Exchange of Notes between Canada and the United States of America dated September 16, 1964, or pursuant to the 1999 Exchange of Notes authorizing such disposition.

7. During the period of time specified in Section 4.2(c) of the Disposal Agreement, the United States Entity shall not have any obligation to maintain, purchase or reserve transmission for future deliveries to the Points of Delivery as Entitlement Delivery Amount of the portion of the Canadian Entitlement delivered within the United States pursuant to Section 4 of the Disposal Agreement; provided that if the Canadian Entity requests that the United States Entity purchase or reserve transmission for future deliveries of such portion of the Canadian Entitlement as Entitlement Delivery Amount to the Points of Delivery pursuant to this Agreement and agrees to pay all costs associated with such actions, the United States Entity shall purchase or reserve the transmission, requested by the Canadian Entity, if such transmission is available in the market for purchase or reservation.

8. **Canadian Entitlement that is being disposed of within the United States as authorized by the 1999 Exchange of Notes shall, upon written notice from the Canadian Entity pursuant to paragraph 11 prior to expiry or suspension of the disposal, be delivered at the Points of Delivery as Entitlement Delivery Amount in accordance with paragraph 3 upon expiry or suspension of the disposal to the extent that:**

- (a) firm transmission capacity required to deliver such Entitlement Delivery Amount at the Points of Delivery is available for purchase by the United States Entity, including by way of assignment; and
- (b) the United States Entity's Transmission Cost in any year of delivering such Entitlement Delivery Amount does not exceed the Annual U.S. Obligation for such year.

9. If firm transmission capacity required to deliver a portion of the Entitlement Delivery Amount referred to in paragraph 8 at the Points of Delivery is not available for purchase by the United States Entity, the United States Entity shall so notify the Canadian Entity, and:

- (a) the Canadian Entity may request a lower quality or quantity of delivery than that specified in the Treaty and this Agreement, and if the transmission required to deliver the requested capacity and energy is available for purchase, the United States Entity shall so deliver such Entitlement Delivery Amount at the Points of Delivery; and/or
- (b) the Canadian Entity may notify the United States Entity that it wishes the United States Entity to procure redispatch, construction or modification of transmission facilities and, subject to the Canadian Entity agreeing to reimburse the United States Entity for any Transmission Cost that exceeds the Annual U.S. Obligation, the United States Entity shall procure such redispatch, construction or modification and so deliver that portion of the Entitlement Delivery Amount at the Points of Delivery.

10. If, for any year, the United States Entity's Transmission Cost of delivering the portion of the Entitlement Delivery Amount referred to in paragraph 8 at the Points of Delivery would exceed the Annual U.S. Obligation for such year and the Canadian Entity agrees to reimburse the United States Entity for all of its Transmission Cost in excess of the Annual U.S. Obligation, then the United States Entity shall purchase such transmission and deliver such Entitlement Delivery Amount at the Points of Delivery.

11. The Canadian Entity shall notify the United States Entity in writing if it wishes all or portions of the Canadian Entitlement being disposed of within the United States to be delivered as Entitlement Delivery Amount at the Points of Delivery pursuant to paragraph 8 upon expiry or suspension of any disposal. Within a reasonable period of time after receipt of the foregoing notice or notice pursuant to paragraph 9, and before the United States Entity purchases transmission or procures redispatch, construction or modification of transmission facilities, the United States Entity shall notify the Canadian Entity of any expected excess costs referred to in either subparagraph 9(b) or paragraph 10 or both. Within a reasonable period of time after the United States Entity's notice, the Canadian Entity shall notify the United States Entity in writing whether the Canadian Entity agrees to reimburse the United States Entity for all excess costs referred to in either subparagraph 9(b) or paragraph 10 or both. If the Canadian Entity agrees to reimburse the United States Entity for such excess costs, the Canadian Entity shall be obligated to do so, whether or not

such transmission is used by the Canadian Entity. The Canadian Entity and the United States Entity shall from time to time at the request of the other party provide information necessary to determine these excess costs and the Annual U.S. Obligation. Any portion of the Canadian Entitlement that can not be delivered under paragraph 8 or paragraph 10 due to failure of the Canadian Entity to notify the United States Entity to procure transmission under paragraph 9 or to agree to reimburse the United States Entity under paragraph 11 for excess costs shall be deemed delivered unless British Columbia arranges disposal of such portion of the Canadian Entitlement in the United States pursuant to the Disposal Agreement.

12. Upon termination of the Disposal Agreement pursuant to Section 10 of the Disposal Agreement, Canadian Entitlement being disposed of within the United States shall be delivered at the Points of Delivery as Entitlement Delivery Amount in accordance with paragraph 3. Delivery at the Points of Delivery shall be made pending any dispute about whether the Disposal Agreement has been properly terminated pursuant to Section 10 of the Disposal Agreement. Any such dispute shall be resolved in accordance with the Disposal Agreement.

13. Paragraphs 8 to 11 inclusive shall not apply to:

- (a) Entitlement Delivery Amount required to be delivered at the Points of Delivery as a result of the termination of the Disposal Agreement pursuant to Section 10 of the Disposal Agreement; or
- (b) Entitlement Delivery Amount delivered under this Agreement upon expiry of an exchange or similar arrangement between British Columbia and Bonneville whereby Entitlement Delivery Amount is exchanged for power delivered to points of delivery in the United States.

Such Entitlement Delivery Amount referred to in this paragraph shall be delivered at no cost pursuant to paragraph 3.

14. If British Columbia has provided a written instrument as described in Section 3.2 of the Disposal Agreement, then the United States Entity shall accept the reductions identified in Sections 3.2(b) and 3.2(c) of the Disposal Agreement of the obligation of the person identified in Section 3.2(a) of the Disposal Agreement and as soon as practicable shall sign amendments to contracts with such person or other instruments necessary to provide for such reductions.

15. Disputes under this Agreement shall be resolved in accordance with the Treaty.

16. If any provision of this Agreement is determined to be unenforceable, that provision shall be deemed severed from and shall not affect the enforceability of the remaining provisions.

17. This Agreement shall not be construed to amend or modify the Treaty or the obligations of Canada or of the United States under it.

IN WITNESS WHEREOF the Entities have caused this Agreement to be executed as of the day and year first above written.

Executed for the Canadian Entity

this 29<sup>th</sup> day of March, 1999

By: Brian R. D. Smith  
Brian R. D. Smith, Chairman

Executed for the United States Entity

this 26<sup>th</sup> day of March, 1999

By: J. A. Johansen  
Judith A. Johansen, Chair

By: Robert H. Griffin  
Robert H. Griffin, Member  
Brigadier General, U.S. Army Corps of Engineers

ATTACHMENT A  
POINTS OF DELIVERY

1. BLAINE NO. 1 POINT OF DELIVERY:

Location: The point at the border between the United States and Canada in the vicinity of Blaine, Washington, where the 500 kV facilities of the U.S. Government and B.C. Hydro are connected on the Custer-Ingledow No. 1 500 kV transmission line;

Voltage: 500 kV;

Metering: at the B.C. Hydro Ingledow Substation, in the 500 kV circuit over which such electric power flows;

Adjustments:

- (1) Demands are totalled with deliveries at the Blaine No. 2 Point of Delivery;
- (2) for losses between the point of metering and the Point of Delivery.

2. BLAINE NO. 2 POINT OF DELIVERY:

Location: The point at the border between the United States and Canada in the vicinity of Blaine, Washington, where the 500 kV facilities of the U.S. Government and B.C. Hydro are connected on the Custer-Ingledow No. 2 500 kV transmission line;

Voltage: 500 kV

Metering: At the B.C. Hydro Ingledow Substation, in the 500 kV circuit over which such electric power flows;

Adjustments:

- (1) Demands are totalled with deliveries at the Blaine No. 1 Point of Delivery.
- (2) for losses between the point of metering and the Point of Delivery.

3. NELWAY POINT OF DELIVERY:

Location: The point at the border between the United States and Canada near Nelway, British Columbia, where the 230 kV facilities of the U.S. Government and B.C. Hydro are connected on the Boundary-Nelway 230 kV transmission line;

Voltage: 230 kV;

Metering: At the U.S. Government's Boundary Substation, in the 230 kV circuit over which such electric power flows;

Adjustments: For losses between the point of metering and the Point of Delivery.

4. WANETA POINT OF DELIVERY:

Location: The point at the border between the United States and Canada in the vicinity of Nelway, British Columbia, where the 230 kV facilities of the U.S. Government and Cominco Ltd. are connected on the Boundary-Waneta 230 kV transmission line;

Voltage: 230 kV;

Metering: At the U.S. Government's Boundary Substation, in the 230 kV circuit over which such electric power flows;

Adjustments: For transmission losses between the point of metering and the Point of Delivery.

## ATTACHMENT B

### CANADIAN ENTITLEMENT SCHEDULING GUIDELINES

These guidelines implement the following Treaty provisions:

Article VII (3) and (4)

- (3) The downstream power benefits to which Canada is entitled shall be delivered as follows:
- (a) dependable hydroelectric capacity as scheduled by the Canadian entity, and
  - (b) average annual usable hydroelectric energy in equal amounts each month, or in accordance with a modification agreed upon under paragraph (4)
- (4) Modification of the obligation in paragraph (3)(b) may be agreed upon by the entities

Article XIV (2)(j)

- (2) In addition to the powers and duties dealt with specifically elsewhere in the Treaty the powers and duties of the entities include:
- (j) making appropriate arrangements for the delivery to Canada of the downstream power benefits to which Canada is entitled including such matters as load factors for delivery, times and points of delivery, and calculation of transmission loss,

#### 1. Interpretations

"Agreement" in this Attachment B means 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.

Initially capitalized terms in this Attachment B will have the meaning ascribed to them in the Agreement. If there is any conflict between this Attachment B and the Agreement, the Agreement will prevail.

"Equal amounts each month" will be interpreted as "constant average kilowatts" which means the amount of Canadian Entitlement energy for any given month is the average annual Canadian Entitlement energy pro rated based on the number of days in that month.

All times stated in this Attachment B are Pacific Time.

Use of the word "scheduling" in conjunction with "Canadian Entitlement" shall mean generation scheduling; use of the word "scheduling" with "transmission" shall mean transmission scheduling; and use of "scheduling" on its own shall mean both generation and transmission scheduling.

2. The Canadian Entitlement will be scheduled on a daily pre-scheduled basis in accordance with and subject to the terms of this Attachment B. The Canadian Entity will use best efforts to schedule in each month all of the Canadian Entitlement energy for that month unless prevented from doing so by a forced outage or emergency conditions at B.C. transmission or generation facilities.
3. Prior to 1000 hours each Friday, or the last working day of the week if Friday is not a working day, the Canadian Entity will provide the U.S. Entity with an estimate (the "Initial Weekly Estimate") of the amount of Canadian Entitlement energy that will be scheduled during the week commencing 2400 hours that day through 2400 hours the following Friday. Prior to 1000 hours each Monday, or the following working day if Monday is not a working day, the Canadian Entity will provide the U.S. Entity with a mid-week estimate (the "Mid-Week Estimate") of the Canadian Entitlement energy that will be scheduled for the balance of the week commencing 2400 hours that day, added to the actual energy delivered or scheduled up to 2400 hours that day.

Prior to 1000 hours each Friday, or the last working day of the week if Friday is not a working day, the Canadian Entity will notify the U.S. Entity of the amount, if any, of available Entitlement Delivery Amount capacity that the Canadian Entity determines in good faith that it does not require at the Points of Delivery specified in subparagraph 3(a) of the Agreement during the following week, and the U.S. Entity will not, therefore, need to make available such Entitlement Delivery Amount capacity.

4. The Canadian Entity will each working day, on or before 0930 hours, provide the U.S. Entity with schedules specifying the hourly Canadian Entitlement deliveries for the following day. If the following day is not a working day, the Canadian Entity will also provide the U.S. Entity with schedules for the day or days up to and including the next following working day.

For the Entitlement Delivery Amount the schedules may specify hourly deliveries of any amount up to the maximum set by the Entitlement Delivery Amount capacity specified in either or both subparagraph 3(a) and/or subparagraph 3(b) of the Agreement.

5. Unless otherwise agreed by the Entities' operating personnel, schedules provided pursuant to paragraph 4 will not be changed by the Canadian Entity, except as may be necessary or advisable due to outage or emergency conditions on the transmission system of an electric utility or other entity receiving deliveries of Canadian Entitlement.
6. The Entities acknowledge and agree that, except as may be agreed by the Entities' operating personnel:
  - 6.1 total deliveries of Canadian Entitlement in any hour will not exceed the Canadian Entitlement capacity;
  - 6.2 Canadian Entitlement capacity is fully discharged when the U.S. Entity makes such capacity available, whether or not the Canadian Entity schedules hourly deliveries up to this capacity; and

- 6.3 to the extent that all of the Canadian Entitlement energy in respect of any month is not or cannot be scheduled during that month by the Canadian Entity, then the undelivered energy will be scheduled by the U.S. Entity for return at the Points of Delivery. When the remaining energy to be delivered in any month exceeds the amount of energy that can be scheduled by full use of the capacity available to the Canadian Entity, the U.S. Entity may schedule delivery of excess energy to the Points of Delivery. The U.S. Entity will endeavour to schedule such energy during the month to the extent possible but may, at its option, schedule such energy up to 7 days into the subsequent month. In making such deliveries, the U.S. Entity will take reasonable account of constraints on the transmission and generation systems in B.C. accepting such energy.
7. To the extent that the Mid-Week Estimate differs from the Initial Weekly Estimate for that week and notwithstanding reasonable efforts the U.S. Entity cannot accommodate the expected daily schedules within existing contractual and system operating constraints, and if the difference is more than the equivalent of a change of 1,000 cfs in flow in the Columbia River at the international boundary, the U.S. Entity may request and the Canadian Entity will, at the Canadian Entity's option, either:
- 7.1 provide or accept an amount of energy to accommodate the difference between the Initial Weekly Estimate and the Mid-Week Estimate, or such other amount as may be mutually agreed; or
- 7.2 make a mid-week flow change in lieu of the amount of energy described in subparagraph 7.1 based on the appropriate total downstream water to power conversion factor ("h/k") for the period under consideration.

Should actual deliveries consistently exceed or be exceeded by the Mid-Week Estimate, the U.S. Entity may request flow changes in addition to those above to cover such differences.

8. Energy delivered pursuant to subparagraph 7.1 will be scheduled by the delivering Entity, unless adjustments are needed by the receiving Entity in order to accept the energy that day due to system constraints. Energy received will be returned during the following week on like hours, unless otherwise agreed. Each Entity will bear all costs of transmitting such energy in its own country.
9. Canadian Entitlement required to be delivered and not delivered due to uncontrollable force will be delivered within 7 days following the outage at times and rates determined by the Canadian Entity but limited by the Canadian Entitlement capacity, unless otherwise agreed.

Canadian Entitlement required to be delivered to points other than the Points of Delivery, and not delivered due to uncontrollable force, may, at the option of the U.S. Entity, be delivered to the Points of Delivery if possible and subject to adjustments needed by the Canadian Entity in order to accept the energy that day due to system constraints.

Canadian Entitlement scheduled to be delivered to points other than the Points of Delivery, which cannot be delivered due to recall of non-firm transmission, or due to failure by British Columbia to schedule transmission which it was responsible for arranging, shall be deemed delivered.

10. Losses associated with Canadian Entitlement deliveries will be dealt with as follows:
  - 10.1 for deliveries of the Canadian Entitlement to the Points of Delivery the losses will be deducted at the time of delivery, and the resulting net Canadian Entitlement will be scheduled and delivered to the Points of Delivery;
  - 10.2 for deliveries of the Canadian Entitlement to points other than the Points of Delivery, the full amount scheduled will be delivered with losses being scheduled for return exactly 7 days later during the same hour as that during which the losses were incurred, or as otherwise agreed by the Entities.
11. The Columbia River Treaty Operating Committee is empowered to act on behalf of the Entities to modify or amend from time to time this Attachment B. Under emergency conditions the operating personnel of the Entities are authorized to agree to deviate from the terms and conditions of this Attachment B during the period of the emergency as may be necessary or advisable.
12. Notice provisions for scheduling to points of delivery in the United States may be covered by the terms and conditions of agreements executed pursuant to the 1999 Exchange of Notes.
13. All transmission schedules to points other than the Points of Delivery under this attachment B must meet the requirements of the transmission provider that apply to all transmission customers at the time of the schedule.
14. The Canadian and United States Entities agree to use best efforts to alleviate any administrative difficulties created by scheduling under these guidelines.

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:30 AM  
**To:** Bedwell, Heidi  
**Subject:** Re: Lauckhart Comments on PSE Application Supporting Attachments nos.  
**Attachments:** Supporting Attachment 5.pdf; Supporting Attachment 6.pdf; Supporting Attachment 7.pdf; Supporting Attachment 8.pdf; Supporting Attachment 9.pdf; Supporting Attachment 10.pdf; Supporting Attachment 11.pdf

Ms Bedwell-

Supporting Attachments 5, 6, 7, 8, 9, 10, 11 re email below.

Richard Lauckhart

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:19 AM  
**To:** hbedwell@bellevuewa.gov  
**Subject:** Lauckhart Comments on PSE Application for a CUP re Energize Eastside (File # 17-120556-LB)

Ms Bedwell-

You have advised me that Individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) to be a party of record for the CUP/CALUP applications.

By this email I am formally submitting my written comments. See attached. Note that my comments also refer to 17 Supporting Attachments. I will be submitting those 17 attachments in separate emails that refer to these comments because of the size limitation on email with attachments.

Please include the attached email and the related 17 Supporting Attachments (coming in separate emails) in the record for this CUP proceeding.

My names is: Richard Lauckhart  
My address is: 44475 Clubhouse Drive, Davis, California 95618  
My email address is: lauckjr@hotmail.com

Richard Lauckhart  
Energy Consultant  
Commenting on behalf of PSE home owners who live on the East Side  
Former VP at Puget

## **Supporting Attachment No. 5**

To Comments made by Richard Lauckhart dated December  
11, 2017

Blowing the Whistle Slide show questioning  
PSE's motive and proof of the need for EE

# Is Energize Eastside needed?

Questioning PSEs Motive and Proof

By: J. Richard Lauckhart  
Energy Consultant, Davis, Ca  
[lauckjr@hotmail.com](mailto:lauckjr@hotmail.com)  
Former VP at Puget

## Why am I involved?

- I now live in California and will not experience the negative environmental impacts of EE
- But I don't like it when large corporations promulgate a "Scam" on the public to enhance their profitability.

## What insights do I have?

- I did not have insights to “blow the whistle” on the VW emissions cheating scam
- I did not have insights to “blow the whistle” on Bernie Madoff’s investment scam.
- I did not have insights to “blow the whistle” on Enron’s scam.
- **But I do have insights and expertise to “blow the whistle” on PSE’s EE scam.**

## What have I done to communicate my insights?

- I have written a paper on PSE's motivation to build the EE project.
- I have written a paper Setting the Record Straight on Energize Eastside's Technical Facts
- This presentation provides an overview of what is in those two papers.

## PSE's motivation for building EE

- In 2007 PSE and Macquarie announced that Macquarie intended to purchase all of the common stock of PSE
- PSE and Macquarie worked through a long process to get regulatory approval
- In 2009 PSE and Macquarie completed the purchase
- As a result, Macquarie is now the decision maker for PSE

## Why did Macquarie want to purchase PSE?

- PSE gets a regulated “rate of return” on its investments. That rate of return is approximately 10%
- Macquarie has access to a large amount of funds that it wants to invest and earn as large a return as possible.
- Where else can Macquarie make 10% on new investments today?

# What did Macquarie say publicly about why it wanted PSE?

- Christopher Leslie, chief executive of Macquarie Infrastructure Partners stated:

*“We don’t have employees. We’re not the neighboring utility. Combining work forces and eliminating redundancies is not the story. **Our interest is to grow the business.**”*

*Mercer Island Reporter...November 25, 2008*

- By “growing the business” Macquarie can invest new funds and get a regulated return of approximately 10%

## How much Money did Macquarie plan to use to grow the business?

- Macquarie stated they were committed to investing \$5 Billion dollars in new PSE infrastructure.
  - This is no small amount given that the total price paid by the investment group to purchase PSE then existing infrastructure was \$7.4 billion dollars

# How is Macquarie progressing on its plan to make \$5 Billion in new investments in PSEs regulated business?

- Indications are that it is not going well:
  - Since its 2007 announcement, the economic slowdown reversed the trend of increasing energy consumption
  - New technology and more focused conservation efforts continued to reduce electricity and natural gas consumption, even as population growth and economic activity rebounded in the Puget Sound region.
  - Part of PSEs service territory has been converted to Public Utility District (PUD) ownership and operation, reducing the need for new investment.

# What kind of infrastructure does Macquarie need to invest in to meet its goals?

- New generation and conservation is problematic for Macquarie because of the “competitive bidding” rules that PSE must comply with
- New Transmission Lines and Distribution lines are the best investments...no “competitive bidding” rules

## **But what do you do if there is no need for \$5 Billion of new transmission and distribution line investment?**

- You try to justify projects that are not needed
- Avoid using PSE staff to make the “justification” because there might be questions about it
- Use scare tactics like “Blackouts will occur without the project”
- In order to “hide” the fact that the investments are not needed and that blackouts will not occur, refuse to show the “justification” or “proof” of the need

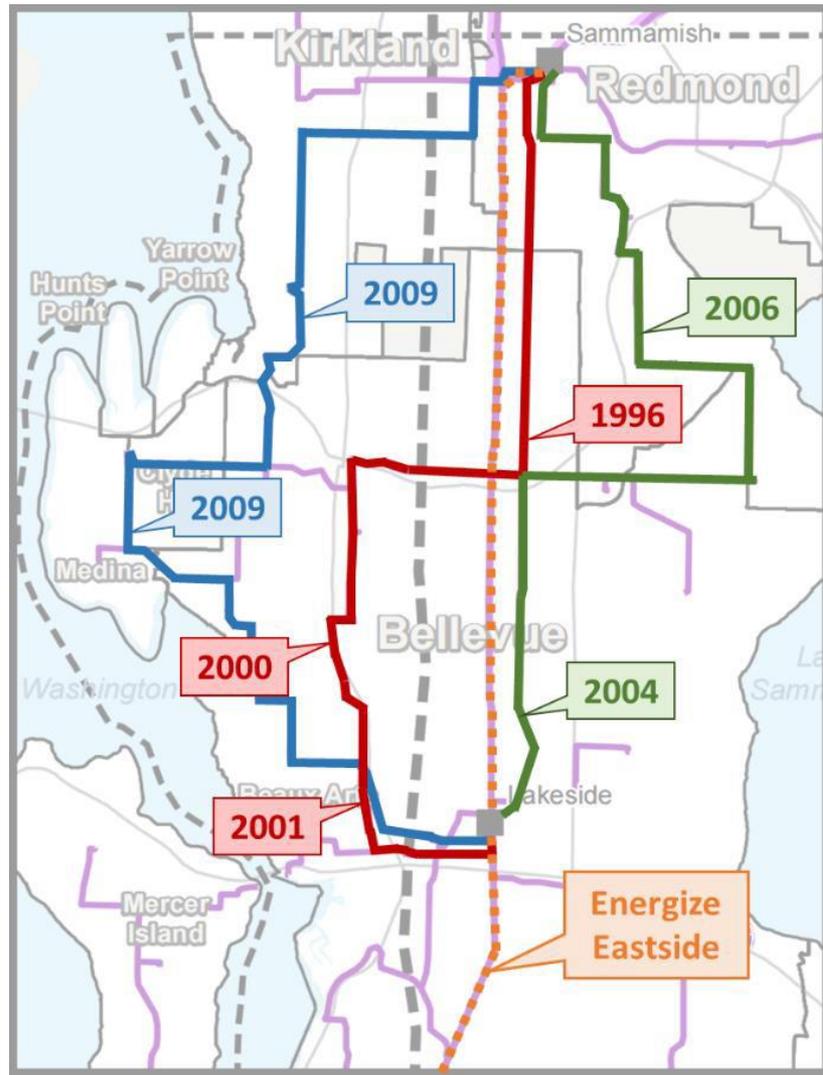
# What can be said about Macquarie's attempt to justify EE?

- Transmission investments can only be justified by use of a “load flow” study
  - The Macquarie/PSE attempt to justify EE, by saying “**nothing has been done to the ‘backbone’ for 50 years**”, is **not sufficient**. Only a load flow study can show if the system needs fixing or not.
  - Macquarie/PSE actually used the load flow study approach in their “Eastside Needs Assessment”

The statement “*nothing has been done to the ‘backbone’ for 50 years*” is wrong!

- In recent years a number of new 115 KV lines have been built on the eastside to serve growing loads
- In essence, the “backbone 115 KV” on the eastside has been replaced with a “Network 115 KV” system.
- See graphic next page...
- **The needed load flow study will necessarily reflect this network of 115 KV lines**

# New 115 KV lines built in the eastside in recent years

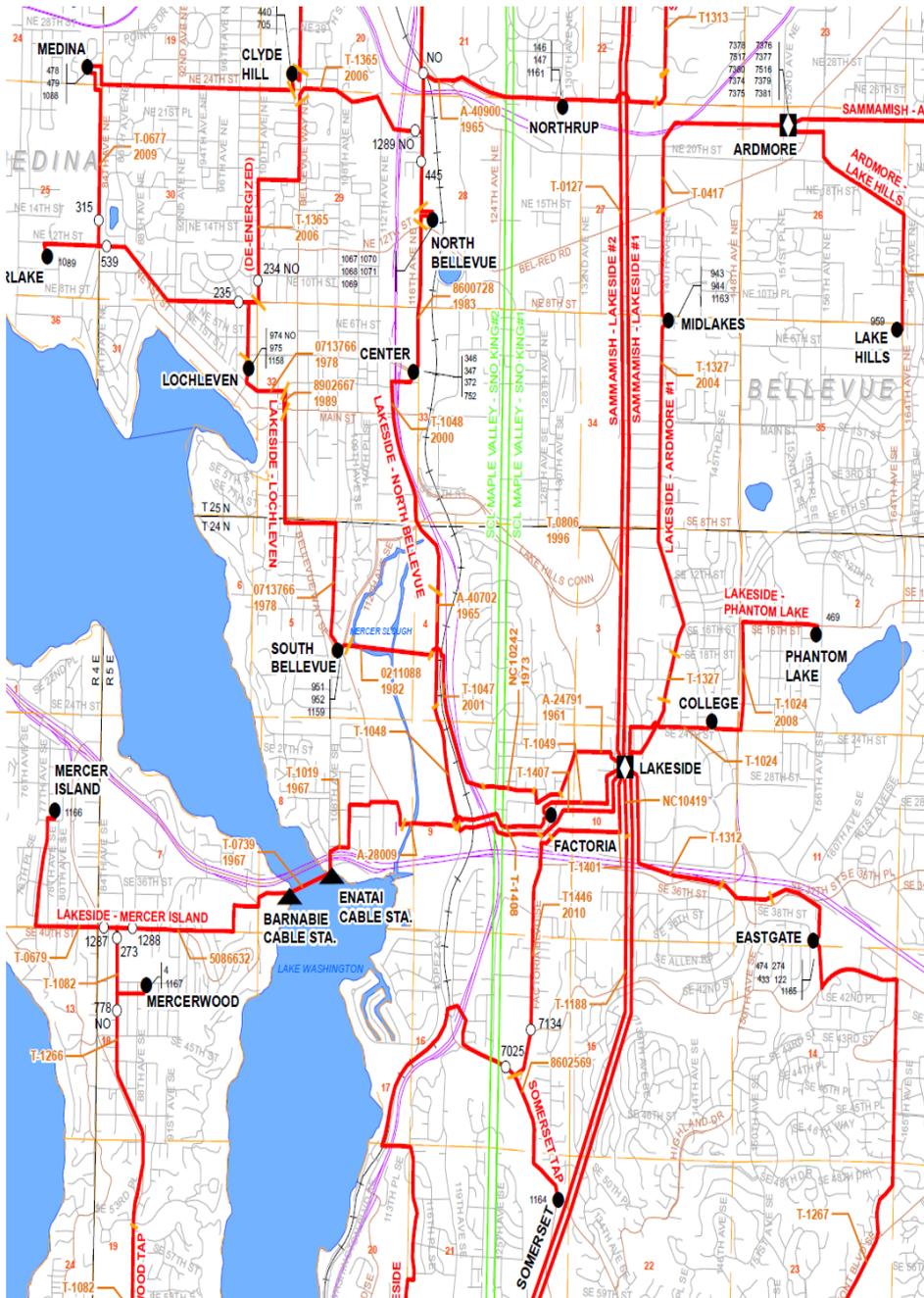


## Who did Macquarie/PSE use to perform the load flow study?

- In order to perform the needed load flow study in 2013, Macquarie/PSE took the unusual step of hiring an outside consultant (**Quanta**) to perform the load flow study to prove the need for Energize Eastside. Not using PSE's in-house experts.

*Note: Quanta has done considerable consulting work for Macquarie in other areas of the country. Quanta will want to keep Macquarie happy.*

**What is a  
“load flow  
study?”**



Grids can get complicated.

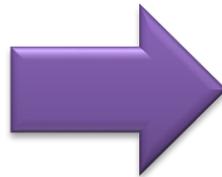
We use computer simulations to study how the grid reacts in different situations.

Red lines show *transmission* lines not *distribution* lines.

# Load flow study

## *Inputs*

- Physical layout of grid
- How much electricity is needed
- How much electricity can be generated
- Resistance in each wire



## *Outputs*

- How much electricity passes through each part
- Warning if any part overloads
- Warning if voltage drops too much

## Did Quanta correctly perform the study?

- No, Quanta did not correctly perform the study. In doing their load flow analysis, Quanta:
  - changed the data that PSE reports to federal energy agencies and
  - made a number of questionable assumptions that go beyond normal industry practice.

## What does this information cause you to conclude?

- I believe that Macquarie/PSE are pursuing this project for the sole purpose of increasing profits for Macquarie.
  - The transmission line will be expensive for PSE's customers,
  - It won't increase reliability or provide other benefits to PSE customers
  - It will damage the environment.

# PSE has provided no legitimate “proof” of the need for EE

- Again...Transmission investments can only be proven necessary by use of a “load flow” study
- The Eastside Needs Assessment performed by PSE/Quanta states the need was identified by a load flow study.
- Quanta concluded that PSE’s equipment might overload under extraordinary conditions:
  - simultaneous failure of two transformers,
  - on the coldest day of the year,
  - at the same time a huge amount of electricity is being transmitted to Canada, and
  - half a dozen local generation plants are shut down.

# What was your initial reaction to these assumptions?

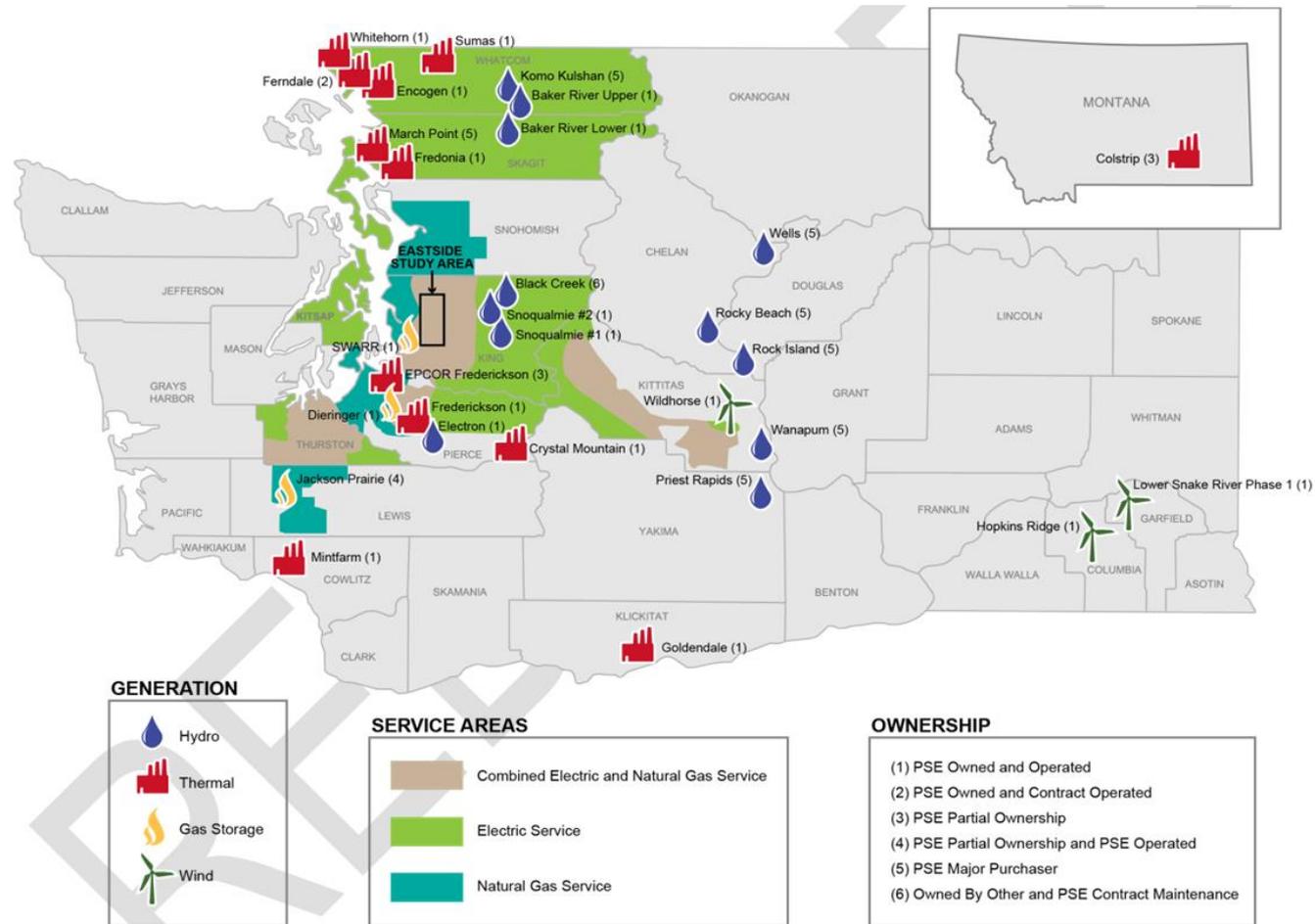
- First I was shocked that their study shut down not one, not two, but six local generation plants
  - I was vice president of power planning during the time we acquired these local generation plants. We worked hard to acquire them for the purpose of providing power *in exactly the type of need scenario that Energize Eastside is based on* - peak need on a very cold (less than 23F) winter day.
- After shutting down those six plants, PSE is very short on having sufficient power to cover their System Peak load. **Quanta did not say how PSE would meet its Total System load with these six plants shut down.**

# What are the plants that Quanta shut down?

		Max MW	Quanta MW
CCCT	Encogen	185	125
CCCT	Ferndale	282	0
CCCT	Fredrickson 1 (PSE share)	141	0
CCCT	Goldendale	278	278
CCCT	Mint Farm	297	297
CCCT	Sumas	140	0
	sub total	1323	700
SCCT	Fredonia 1&2	225	0
SCCT	Fredonia 3&4	116	0
SCCT	Whitehorn 2&3	162	0
SCCT	Fredrickson 1&2	162	0
	sub total	665	0
	<b>TOTAL</b>	<b>1988</b>	<b>700</b>

# Where are those 6 plants located?

Essentially the red plants in the Puget Sound Region on the map below

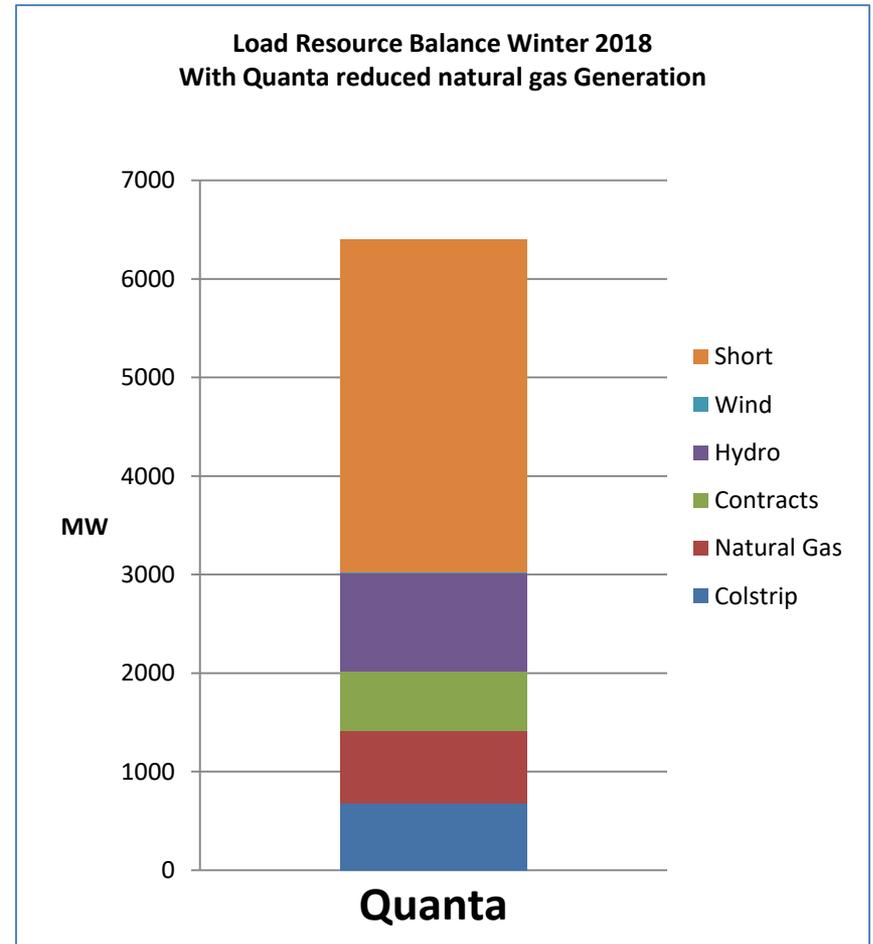
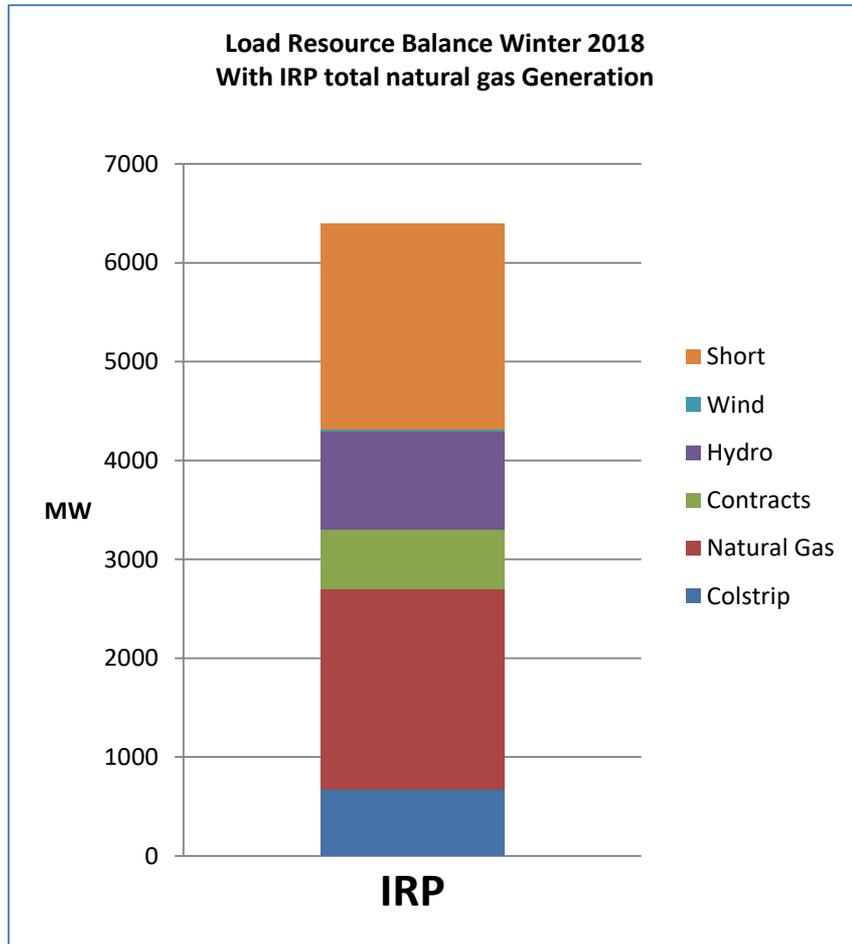


# How Much Power does PSE need to meet its System Peak Load in Winter 2018?

- *According to PSE's IRP, PSE needs 6,500 MW of supply to meet its System Peak plus reserve requirements in the winter of 2018*
- *According to PSE's IRP, PSE is "short" by about 2100 MW of having sufficient generation to cover this need.*
- *While that is a very large "shortage", it gets even larger (nearly 3,400 MW) under the Quanta Load Flow model assumptions...an untenable shortage.*

*– See graphic on next slide*

# PSE "Short": IRP vs Quanta



## What other assumptions did Quanta make that you found problematic?

- The assumption that 1,500 MW would be flowing to Canada under this extreme cold event was another problem.
  - I am aware that the Columbia River Treaty does not mandate that 1,500 MW be delivered to Canada under such an extreme cold event.
- I was interested in seeing the Quanta load flow input data file to see what other assumptions that they might have made that I thought were problematic.

## Did you ask to see the Quanta files?

- Yes, I requested that PSE provide me the Quanta files
- **PSE denied my request**, which was surprising to me since I had already received the requisite security clearance from the Federal Energy Regulatory Commission (FERC). FERC stated that I had a legitimate need to review the data.

# Why did PSE deny your request?

- PSE refuses to show me the Quanta load flow study data file because they fear that I may use the data to find weaknesses in the grid which will allow me to perform terrorist outages on the grid.
- I already have significant knowledge about the grid and the weaknesses in it. I already have the information I would need to perform terrorist activities if I were so inclined, which I am not.
- PSE's reason for denying my request is not legitimate.
  - I believe that PSE is denying my request because they know that I will find (and point out) that the Quanta load flow study is flawed.

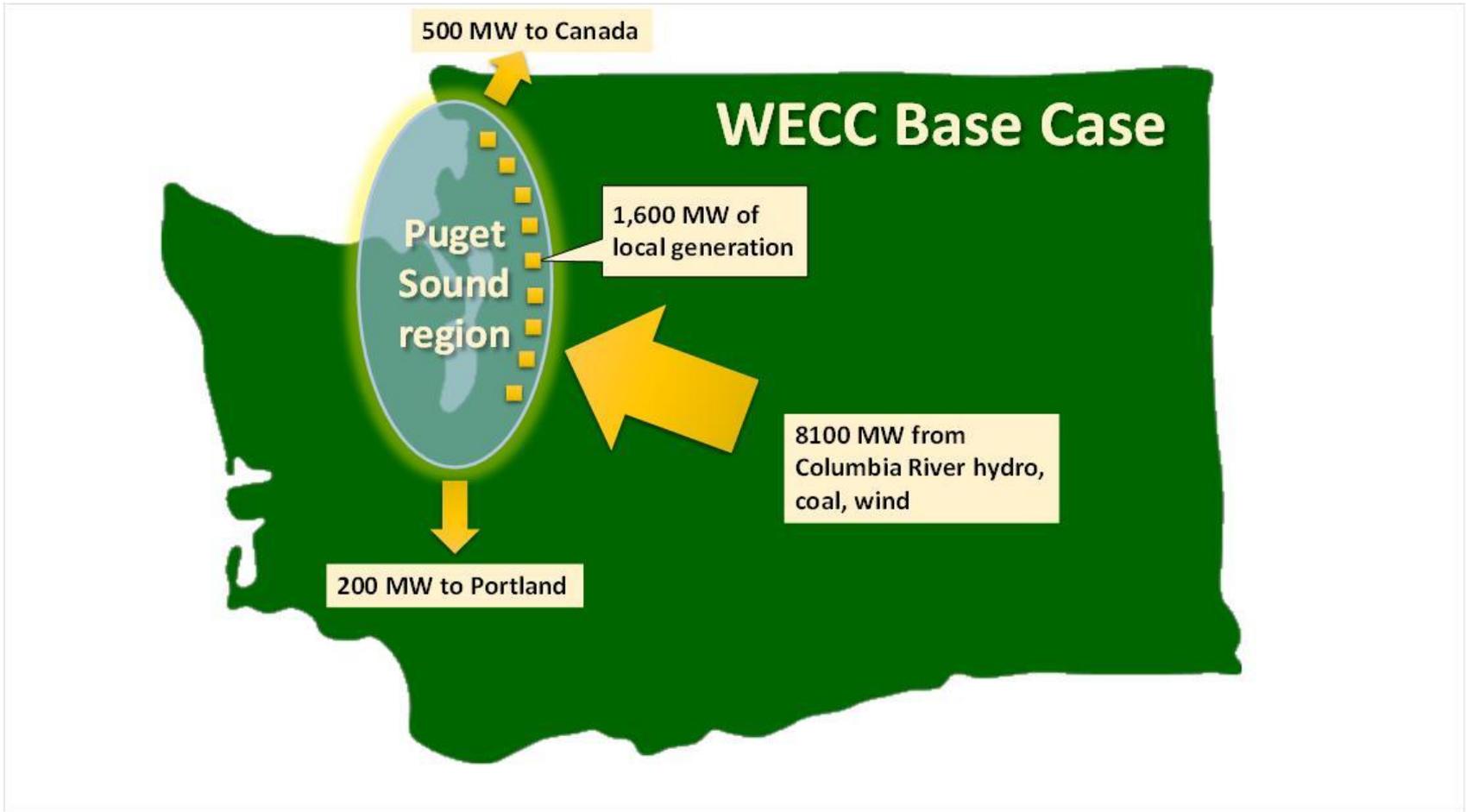
# What did you do after PSE denied your request?

- I asked FERC to provide to me the load flow Base Case data that PSE had filed with FERC.
- FERC provided me that PSE load flow Base Case data.
- I observed that PSE's load flow Base Case data for the winter of 2018 has more appropriate assumptions in this cold winter situation regarding (a) local area generation operation and (b) flows to Canada.
- I recruited another transmission expert, Roger Schiffman, to obtain the utility standard load flow study computer model and we conducted our own load flow study of the need for Energize Eastside starting with the load flow Base Case data that PSE filed with FERC.

# What did you learn from the Lauckhart-Schiffman load flow study effort?

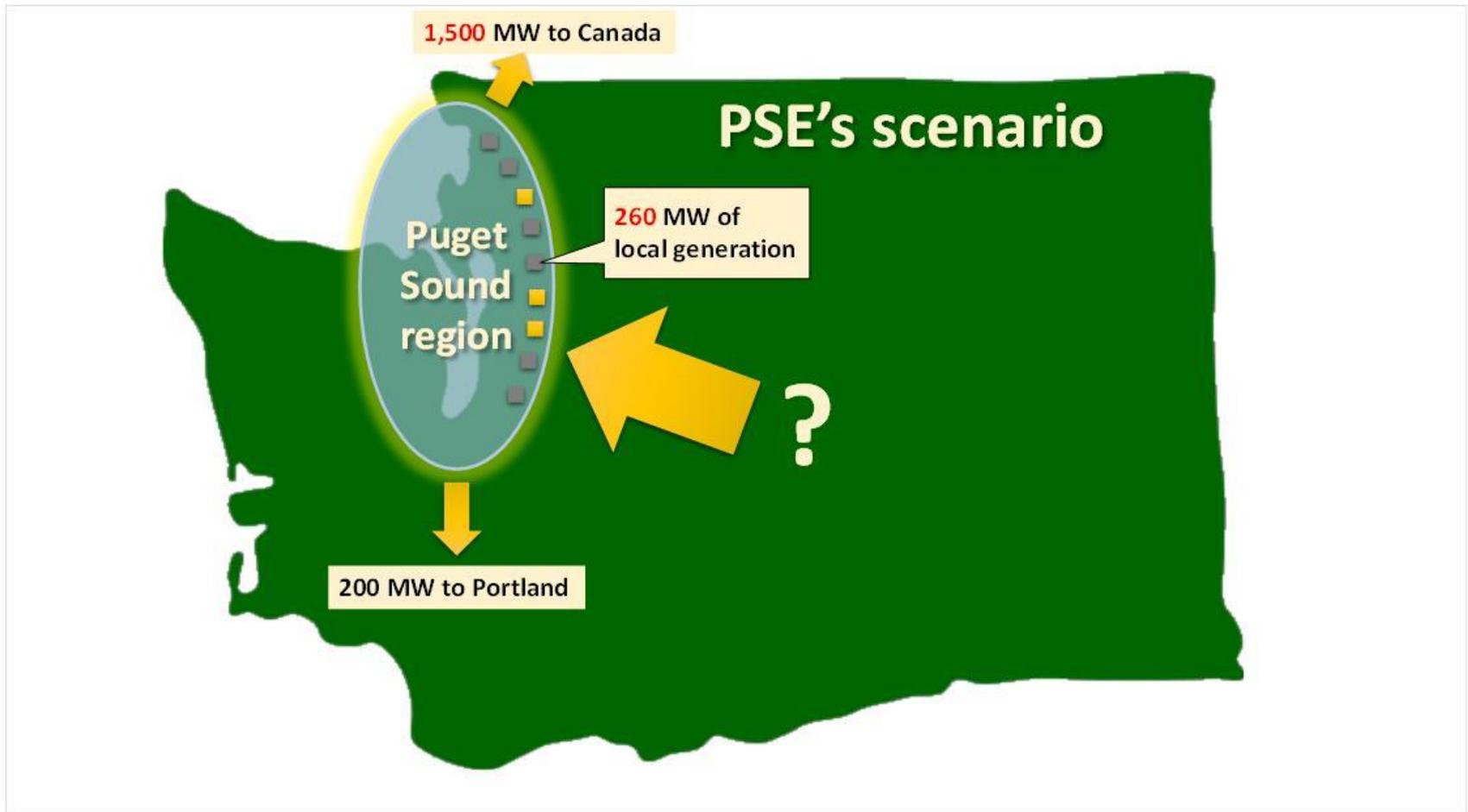
- I learned that Energize Eastside is not needed if appropriate assumptions are reflected in the load flow study. No blackouts will occur if EE is not built.
  - [See Lauckhart-Schiffman *Load Flow modeling for “Energize Eastside”* report dated February 18, 2016]
- I learned that the greater Puget Sound Region of the grid will experience major problems (aka blackouts) with or without Energize Eastside being built *based on Quanta’s problematic assumptions.*
- I learned that in order for Quanta to avoid these other blackout problems with their assumptions, that Quanta must have made other changes to the PSE Base Case load flow data for the winter of 2018.

# PSE's Winter 2018 Base Case



# The PSE/Quanta Problematic Scenario

## And resulting Cross-Cascades problem



**Has PSE provided any information that helps you develop an educated guess of what other changes Quanta made?**

- Yes. In the EIS process for Energize Eastside, PSE provided a listing of a number of “electrical criteria” it was using in its studies of the need for Energize Eastside.
- Three of those criteria jumped out at me as being particularly inappropriate

# What was the first criterion you found problematic?

- PSE stated criterion number 7: *"Adjust regional flows and generation to stress cases similar to annual transmission planning assessment."*

Here is what that means!!!:

- In 2013, ColumbiaGrid had run a "stressed load flow case" **for information purposes** just to see how the system would respond if the Base Case was adjusted to significantly increase stresses on the system. (e.g. shut down Puget Sound Area generation and increase flows to Canada)
  - ColumbiaGrid indicated that this "stressed load flow case" caused significant adverse impacts on the system but there was no need to make any fixes to the system to address those problems as a result of this stressed case run because **the case exceeds NERC Reliability Criteria**.
- ***BUT PSE has made this the main scenario for looking at the need for EE! That makes no sense.***

## What were other criteria you found problematic?

- **PSE stated criterion number 8:** *"Take into account future transmission improvement projects that are expected to be in service during the study period."*
- **PSE stated criterion number 2:** The "Study Period" was from 2015-2024.

It appears that in order for Quanta to make their Load flow study work without causing blackouts in the greater Puget Sound area that Quanta assumed that at least one and probably two new Cross North-Cascades transmission lines are built. **No one is currently pursuing these infrastructure improvements.**

# What do you conclude about the Quanta load flow study?

- In a nutshell Macquarie/PSE/Quanta have decided to run a Load Flow study to determine the need for EE, which load flow study has major flaws.
- First it starts with a scenario that has negligible probability of occurring.
- A Scenario that vastly exceeds FERC/NERC reliability criteria.
- Then in order to make that Scenario work electrically, Quanta seems to have modeled new Cross North-Cascades transmission lines that no one is working on.
- And no one is working on them because any load flow scenario that is consistent with FERC/NERC reliability criteria shows the new Cross North-Cascades transmission lines are not needed.

# Is the Quanta load flow study appropriate for examining the need for Energize Eastside?

- No. This Macquarie/PSE/Quanta load flow study is completely inappropriate for studying the reliability of power service to the Eastside.
- The Lauckhart-Schiffman load flow study is the appropriate way for studying the reliability of power service to the Eastside.
- **The Lauckhart-Schiffman study demonstrates that EE is not needed.**

## Has PSE provided “proof” of the need for EE?

- No. PSE has not provided the load flow study that it claims demonstrates the need for Energize Eastside.
- The Lauckhart-Schiffman load flow study, which is based on PSE’s Base Case, demonstrates that Energize Eastside is not needed.
  - *PSE has criticized the Lauckhart-Schiffman load flow study for running all the Puget Sound area generation and for not sending 1,500 MW to Canada. These criticisms have been fully rebutted [see attachment to Lauckhart email to EnergizeEastsideEIS dated April 29, 2016]. The Lauckhart-Schiffman assumptions are more in line with what regulators expect and which correctly balance environment, cost and risk of outage. The Lauckhart-Schiffman assumptions are also consistent with PSE’s Base Case filed with FERC*

By all indications.....

- PSE is promulgating a “scam” on the public to enhance their profitability
- The “scam” imposes significant adverse environmental impacts on the public but no benefits

**It must be stopped**

# Action that the four cities and EBCC should take

- Issue the following ultimatum to PSE

***“If you do not make your load flow studies available for inspection by individuals that have CEI clearance from FERC, we will not even consider issuing a permit for Energize Eastside.”***

## **Energize Eastside will provide no reliability benefit to the Eastside**

- The Eastside has had numerous power outages in the past and will continue to have power outages in the future. These outages are primarily caused by wind blowing trees and limbs into the localized overhead 12 KV distribution lines.
- **Energize Eastside will do nothing to decrease these outages in the future.**

# The EIS staff is wrong

- The December 21, 2016 *Phase 2 Draft EIS – Scope of Analysis* includes a discussion of the “No Action” alternative. The following sentence is included in that discussion:

*“If no action is taken, load shedding (forced power outages within the Eastside) would likely be needed during the highest demand periods in the near future.”*
- **As pointed out in the rest of this report, there is no legitimate evidence on the record that this statement is true. In fact, the legitimate evidence on the record is that this statement is false**

# PSE's bogus scenario

## One more (detailed) look

- Very cold (i.e. 23 degree) weather occurs on the eastside during evening peak load hours...an event that normally occurs only once in every few years
- **At that same time**, 1,500 MW is being delivered to Canada...but:
  - There is no requirement to deliver 1,500 MW to Canada under such an event. [*See comments filed by Christina Aron-Sycz dated August 1, 2016 which includes a White Paper entitled "Evidence that there is no requirement to deliver 1,500 MW to Canada on a Firm Basis....Resulting Conclusion is that EE is not needed."*], and
  - The Puget Sound Region in total would experience low voltage caused blackouts if 1,500 MW is being delivered to Canada during such a cold weather event.

# PSE's bogus scenario (Cont.)

- **At the same time** PSE has shut down 6 of its Puget Sound Area generators...something that PSE would not do under such a cold event because
  - Puget would not be able to meet its own Total System Load without these generators running (*these generators were built to provide power under these circumstances and it is absurd to say they would not be operated under these circumstances*), and
  - The Puget Sound Region in total would experience low voltage caused blackouts if 6 Puget Sound Area generators are shut down during such a cold weather event.
- **At the same time** two major 230/115 KV transformers fail at the same time when all these other things are happening...*But since all these other things cannot happen at the same time without there being low voltage caused blackouts, this scenario makes no sense.*

# The EIS Record

- CENSE and Mr. Lauckhart have placed a number of documents on the EIS record that provide evidence that Energize Eastside will not reduce the number of outages on the PSE system on the eastside.

# Conclusion from the EIS Record

- The scenario that PSE claims needs the Energize Eastside line in order to increase reliability of electricity supply to the Eastside will never happen. That justification for building Energize Eastside is not legitimate.
- The Lauckhart-Schiffman load flow study (which used PSE's Base Case data set for the Winter of 2018) demonstrates that Energize Eastside will provide no reliability benefit to the eastside.
- **The No Action alternative will not result in any blackouts on the eastside or elsewhere on the grid.**

## **Supporting Attachment No. 6**

To Comments made by Richard Lauckhart dated December 11, 2017

Backstory on PSE's motive to build EE

## **The backstory: What is truly motivating PSE to try to build Energize Eastside?**

To: City staff and council

From: Rich Lauckhart

### **Introduction**

As you may already know, I am an energy consultant who spent the bulk of my career working for Puget Power (PSE's predecessor) as vice president of Power Planning. It was my job to oversee the permitting and construction of many kinds of projects in the Puget Sound region including high voltage transmission lines and nuclear power plants.

What you may not know is that I also hold an M.B.A. in Finance. During my time at Puget Power as well as at other firms, I had great exposure to not only the technical side of power planning, but also to the business side of each project. I know that most customers assume that a company that provides a basic necessity such as electricity is just "trying to keep the lights on" and that there is a lot of inherent trust in power companies. However, both from my long experience in the industry and the multitude of news articles from across the country, it's no secret that privately-held, for profit power companies function just like any other for-profit business. They seek to turn a profit. This is not in and of itself a bad thing.

However, there are too many recent examples of when power companies across the U.S. have attempted to get an unnecessary project built in order to get the guaranteed profit from the state, and I feel that PSE's Energize Eastside is yet another example of this. In the case of Energize Eastside, it is the "perfect storm" for this type of attempt for four reasons. One, Washington state has very outdated regulations compared to other states that incentivize power companies to build big transmission projects rather than invest in smarter technologies currently being used across the U.S. Two, there is remarkably little oversight to PSE's major projects before they get built. In the case of Energize Eastside, this billion dollar, eighteen mile project has the potential to be built without any prior vetting or review by any state regulators - only a permit from four city councils. The project gets approved into the rate base after it is built. Three, Washington offers a generous rate of return of 9.8% on the lifetime of the project. In the case of Energize Eastside, that means over \$1 billion for PSE's Canadian and Australian investors. This is a huge incentive. Lastly, both myself and CENSE.org have provided compelling evidence that Energize Eastside is not needed. Yet Puget Sound Energy (PSE) continues to push to build the project. Why would PSE want to build the Energize Eastside project if it is not needed?

This paper discusses these points.

## **Background**

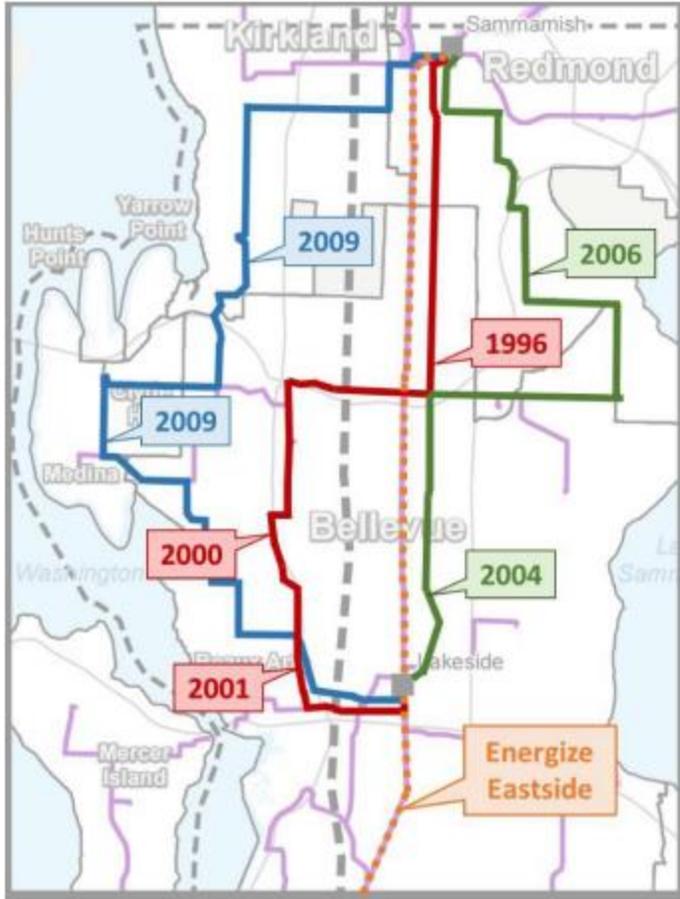
For most of its history, Puget Sound Energy (PSE) had publicly traded common stock. Shareholders elected representatives to serve on PSE's Board of Directors. The board members hired a CEO to run the company, and relied on the CEO to make day-to-day decisions. In this way, PSE was accountable to its shareholders, many of whom lived in PSE's service territory.

This all changed in 2009, when an Australian investment bank named Macquarie purchased all of the company's common stock. The total cost of the acquisition was \$7.4 billion. It was and still is highly unusual for a foreign-owned company to own a U.S. utility. Upon purchase, Macquarie stated its intention was to invest an additional \$5 billion in the company by building new infrastructure. In so doing, Macquarie planned to collect the guaranteed 9.8% rate of return on infrastructure investments that is allowed by PSE's regulator, the Washington Utilities and Transportation Commission (WUTC).

However, several unforeseen developments thwarted Macquarie's plans. First, shortly after the acquisition was announced in 2007, the recession reversed the trend of increasing energy consumption. Second, new technology and more focused conservation efforts continued to reduce electricity and natural gas consumption even as population growth and economic activity rebounded in the Puget Sound region. Third, a portion of PSE's service territory was converted to Public Utility District (PUD) ownership and service.

Like any profit driven corporation, Macquarie likely pondered what projects they could pursue to bolster PSE's sagging revenues. The 18-mile double circuit 230 kV transmission line running through the Eastside probably looked like a good candidate. For a number of years PSE had considered installing a new 230kV to 115 kV transformer at the Lakeside substation, which would have required building new 230kV lines between Talbot Hill and Lakeside and between Sammamish and Lakeside. However, every time this was studied it was determined that other less costly infrastructure projects were preferable to meet the growing loads on the Eastside.

But when Macquarie was looking for high cost new infrastructure projects, it appears that this older plan was picked up off the shelf and dusted off. The original two 115 kV lines were built almost 50 years ago, and I believe that PSE felt it would be easy to convince local city councils to support the new 230 kV plan by making it sound like a simple "upgrade" to an "old line" which is exactly the language they have chosen in their ads. The "Energize Eastside" project was born, ignoring the reality that the original twin eighteen mile 115 kV lines had been augmented with many new 115 kV lines in recent years (see figure below). In essence, the original twin 115 kV "backbone" lines have been turned into a robust "network" of 115 kV lines. The eighteen mile twin 115 kV line that follows the proposed path of Energize Eastside ceased being a "backbone" decades ago.



Normally, the technical need for a transmission line would be studied by PSE's in-house transmission experts. In my many years at Puget Power, we only used our own in house transmission experts since they knew our area's grid the best. However, PSE instead hired Quanta, a consulting firm based in North Carolina. I could not find any basis that Quanta has prior experience with the Northwest power grid, but they have done quite a bit of work for Macquarie in other areas of the country where Macquarie had made investments.

As I describe in detail in my other paper, "Setting the Record Straight on Energize Eastside's Technical Facts", I believe that In order to make the project data work in PSE's favor, Quanta made several changes to the core data that PSE reports to federal energy agencies and made a number of questionable assumptions that go beyond normal industry practice. As I also explained in my other paper, when I tried to duplicate Quanta's results and implement those same changes to the core data, I found that the Quanta's assumptions caused significant problems for the entire power grid, not just the Eastside. When asked about these problems, PSE refused to provide any data or technical explanation to refute my findings.

In the two decades that I worked for the company, PSE worked closely with the communities and did a good job of supplying reliable power to their customers. I never witnessed a project that put forth without a solid, demonstrated need. However, based on the facts surrounding PSE's highly questionable load flow

study and the overall obvious lack of demonstrated technical need for this project, I believe that PSE's main goal with Energize Eastside is to increasing profits for its Australian and Canadian investors. There is simply no evidence of a technical need for this project. Energize Eastside will be extremely expensive for all of PSE's 1.1 million customers, it won't measurably increase reliability, and it will damage the environment. Again, as I mentioned at the outset of this paper, this is unfortunately not an unusual or isolated example in the present day U.S. power grid.

Until PSE provides real, technical evidence in the form of the load flow data that shows why Energize Eastside is necessary, I must conclude that it is not.

### **New Ownership of PSE in 2009**

In 2009 a consortium formed by Macquarie Infrastructure, the Canada Pension Plan Investment Board, the British Columbia Investment Management Corp. purchased all of the common stock of PSE.<sup>1</sup>

### **Who makes the decisions for PSE after this purchase?**

That answer can be found in a filing made in 2007 with the Washington Utilities and Transportation Commission (WUTC) and in a filing made in 2016 with the Federal Energy Regulatory Commission (FERC).

- In the December 2007 filing with the WUTC, the ownership and control of PSE under Macquarie's coordinated purchase of PSE stock, a very complicated picture of ownership and control of PSE was presented. See attachment 1. However, for all practical purposes, it is Macquarie who makes decisions for PSE.
- In the 2016 filing with FERC, Macquarie Energy stated that Macquarie Group Limited ("MGL") maintains ownership and control of PSE.<sup>2</sup>

The important result of the 2009 change in ownership and control of PSE is that for all practical purposes, since 2009, Macquarie makes the decisions on PSE matters.

### **Why did Macquarie (and partner investment firms) want to purchase all of the stock of PSE?**

That answer can be found in a statement made by Christopher Leslie, chief executive of Macquarie Infrastructure Partners. He stated:

*"We don't have employees. We're not the neighboring utility. Combining work forces and eliminating redundancies is not the story. **Our interest is to grow the business.**"<sup>3</sup>*

These investors have access to significant funding that they planned on using to "grow PSE's business." In fact, the investors stated they were committed to investing \$5 billion in new PSE infrastructure. This is no small amount given that the total price paid by the investment group to purchase PSE was \$7.4 billion

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<sup>1</sup> <http://www.pugetenergy.com/pages/news/011609.html>

<sup>2</sup> See July 14, 2016 filing at FERC made by Macquarie Energy in Docket No. ER16-2198

<sup>3</sup> <http://www.mi-reporter.com/news/35017809.html>

dollars.<sup>4</sup>

In this paper I will use the term “Macquarie” to indicate the entity that has ownership and control of PSE.

### **Why would this investment group want to invest \$5 billion in new infrastructure in PSE’s system?**

It is standard practice that investment firms like Macquarie are trying to find investments that give them a good rate of return. In the case of PSE, the WUTC grants a 9.8% return on new investments. This 9.8% return is a very attractive rate of return compared to the return that the investment firms could get elsewhere. So, investing \$5 billion at a 9.8% rate of return is a great investment opportunity. The only catch is that investors only get this return if they can find infrastructure projects that can be shown needed to meet reliability criteria. This determination is made by the WUTC after the project is built.

### **But what if there is no justification for making \$5 billion of new investment in PSE?**

As mentioned earlier in this document, there is ample evidence of utilities across the U.S. attempting to build infrastructure projects that, in the end, cannot be justified. Time and time again, the ultimate goal was to get the generous rate of return offered by the state. They will often go to great lengths to get their projects justified.

### **Why are transmission lines the most lucrative form of investment for PSE?**

Washington State has regulations for utilities that offer the 9.8% rate of return on large scale transmission projects. By contrast, new investments in generation (new power plants) or Demand Side Management (DSM, which are programs that reduce the load and/or increase conservation at the customer level) are somewhat problematic for Macquarie’s and PSE’s goal of achieving a guaranteed profit. This is because the WUTC competitive bidding rule requires PSE to go out for competitive bids for third party entities that can provide the needed generation or DSM for PSE. The WUTC closely monitors this competitive bid activity to be sure that PSE selects the cheapest option. If a third party entity is chosen, then that party makes the investments needed and PSE will generally pay the third party an ongoing fee. By doing this, PSE is not allowed to include these new projects in the PSE rate base and there is no ability to make the desired 9.8% return on investment. However, there is no competitive bidding process for new transmission and distribution projects.

Another reason why Macquarie and PSE are so focused on building transmission lines is that Washington’s regulations have not been updated much since the 1960s and do not provide anywhere near as generous of an incentive for smarter, 21st century technologies. Many other states, including Oregon, California, Texas, and New York have updated their regulations to incentivize utilities to invest in smarter technologies such as demand side management, more aggressive conservation, and efficiency. Washington is lagging behind the times in this respect.

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<sup>4</sup> <http://www.pugetenergy.com/pages/news/011609.html>

As a result, Macquarie and PSE closely monitor their service territory to see what investments may make sense. Does this mean that every new, major transmission project is unfounded? Not necessarily. But it does mean that from a business perspective, PSE's first choice is a project that will achieve the greatest rate of return and enhance the profitability of their investment fund. It's simple business math.

### **How and when did Energize Eastside come to be?**

Approximately 4 years ago (2013), Macquarie decided to see if a new, double circuit 230kV transmission line and substation (i.e. Energize Eastside) "EE" could be justified on the Eastside. Such a project would contribute significantly to Macquarie's goal of making \$5 billion of new investment in PSE.

### **Who did Macquarie choose to investigate to see if Energize Eastside could be justified?**

Macquarie decided not have PSE's internal transmission planning employees do the analysis. Instead, Macquarie decided to have the load flow work performed by an outside company (Quanta Technologies) rather than by PSE's in house load flow experts. Quanta does a lot of work for Macquarie in areas outside of the Pacific Northwest. Quanta Technology, LLC is headquartered in Raleigh, NC with offices in Boston, MA; Chicago, IL; Oakland, CA; Toronto, Ontario and Ecuador in South America. There is no evidence that Quanta Technology has expertise in Northwest transmission and power supply matters.

A load flow study is the critical study used in the industry to test the reliability of the power grid. A load flow study is also used to justify the need for a new transmission project. The Federal Energy Regulatory Commission (FERC)/NERC also require each utility to develop a Base Case load flow study to show there is at least one mix of load, generation and transmission infrastructure that can be shown to reliably serve load in a future year. Generally, utilities provide FERC with several Base Cases reflecting peak loading periods of several different years in the future. FERC then requires utilities such as PSE to file Base Case studies each year so that third parties (such as myself) can utilize the database in each of these Base Case load flow studies to perform our own load flow studies to investigate whether a project proposed by a utility is really needed or not. PSE filed their Base Case studies with FERC and I obtained PSE's base case from FERC to perform my load flow study, with written permission from FERC .

### **Did Quanta use the FERC Base Case to perform its load flow study?**

No. Macquarie did not have Quanta do its load flow study using the same assumptions in the Base Cases PSE filed with FERC. Instead, Macquarie asked Quanta to make significant changes to that Base Case. For example, Quanta was told to assume a 1,500 MW flow to Canada (rather than the 500 MW included in PSE's Base Case) and to assume that 1,400 MW of gas fired generators in the Puget Sound area would not be running during an extreme cold winter peak day (rather than the assumption in PSE's Base Case that all these generators would be running during a winter peak day).

### **Was I able to modify the PSE Base Case in this manner?**

When I, along with transmission expert Roger Schiffman, performed my own load flow study (see paper entitled "Setting the Record Straight on Energize Eastside's Technical Facts" for more details), I obtained PSE's Base Cases from FERC. I then tested these non-standard assumptions as described above. The

Lauckhart-Schiffman load flow study demonstrates that making these two major changes to the PSE Base Case will result in the model failing to find a solution. The problem is that the lines carrying power across the Cascades from the Columbia River region to the Puget Sound region and then north to Canada are not capable of moving all this power without causing unacceptably low voltage on the grid in the greater Puget Sound area. Yet Quanta failed to disclose this problem.

### **Was Quanta able to resolve this cross-Cascades problem?**

It is unclear how Quanta resolved this problem because PSE has refused to share the load flow study. It is also unclear why Quanta decided to make these major changes to the PSE Base Cases. One can only assume that Macquarie gave Quanta the directive to make these changes to the Base Case in order to produce a load flow study that justified the need for Energize Eastside. Macquarie and PSE have refused to make public the load flow studies that Quanta performed and which PSE claims justify the Energize Eastside line. I must therefore conclude, based on the above, that the load flow study that Macquarie/PSE/Quanta have performed in an attempt to justify the need for Energize Eastside has been artificially/inappropriately adjusted. I believe that if Macquarie/PSE had utilized their own internal transmission experts to run this load flow study, the project would have never progressed to its current status because their internal transmission experts would know that these changes to the Base Case are senseless and incorrect.

### **Conclusion**

My goal in writing this paper was to illustrate that when it comes to utilities and profits, and PSE in particular, there is more going on than meets the eye. It appears that Macquarie and PSE, like some other utilities across the U.S., are pushing heavily for a project with no real basis in order to enhance their profits. The factual basis for this project simply does not add up.

PSE will likely respond by saying that I do not understand or that things are different now compared to when I worked for Puget Power. That is not the case. The burden of proof lies on them, not me. They are not being transparent and have not furnished sufficient material evidence that justifies the need for this project. Instead, they hope to gain permitting of a billion dollar project through the vote of city councils. Furthermore, Macquarie has a history of transactions that were deceptive in nature (see attachment 2).

## Attachment 1

WUTC Proceedings<sup>5</sup>

WUTC PROCEEDINGS: On December 17, 2007 Puget Holdings LLC (Puget Holdings) and Puget Sound Energy, Inc. (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) a joint application for an order authorizing the proposed transfer of ownership and control of Puget Energy, Inc. (Puget Energy), and its wholly owned subsidiary, PSE, to Puget Holdings. Puget Holdings is a Delaware limited liability company, with its principal offices in New York, formed expressly for the purpose of acquiring, through wholly owned subsidiaries, all of the outstanding shares of common stock issued by Puget Energy. The proposed transfer of ownership is one step in a financial transaction that would ultimately result in Puget Energy no longer being a publicly traded company. Puget Energy and PSE would be privately owned by Puget Holdings, which is an “Investor Consortium” (Consortium) comprised of several private equity investment companies and several government pension fund managers, all of which maintain portfolios of investments, including infrastructure investments, in the U.S., Canada, and several other nations.

December 30, 2008 WUTC Order Synopsis: The Washington Utilities and Transportation Commission, approving and adopting subject to conditions a Settlement Stipulation proposed by all parties except Public Counsel, authorizes Puget Holdings LLC (Puget Holdings) to acquire Puget Energy, Inc. (Puget Energy), and its wholly-owned subsidiary Puget Sound Energy, Inc. (PSE).

The WUTC Order included a number of statements about the sale of Puget Sound Energy

Decision Making for PSE under the new ownership arrangement:

The proposed change in Puget Energy and PSE’s ownership would mean that Puget Energy would no longer be a publicly traded company. Thus, the numerous investors who currently benefit from the utility’s success and bear the risks of any lack of success will no longer have direct voting rights on matters that must be approved by shareholders. Instead, decision making power will be exercised by the members of the Consortium. Therefore, in evaluating the merits of this transaction it is important to consider carefully the nature of these investors, their plans as owners of Puget Energy and PSE, and the governance structure of their holding company, Puget Holdings.

Puget Holdings is a consortium of six primary investors who own the following percentages:

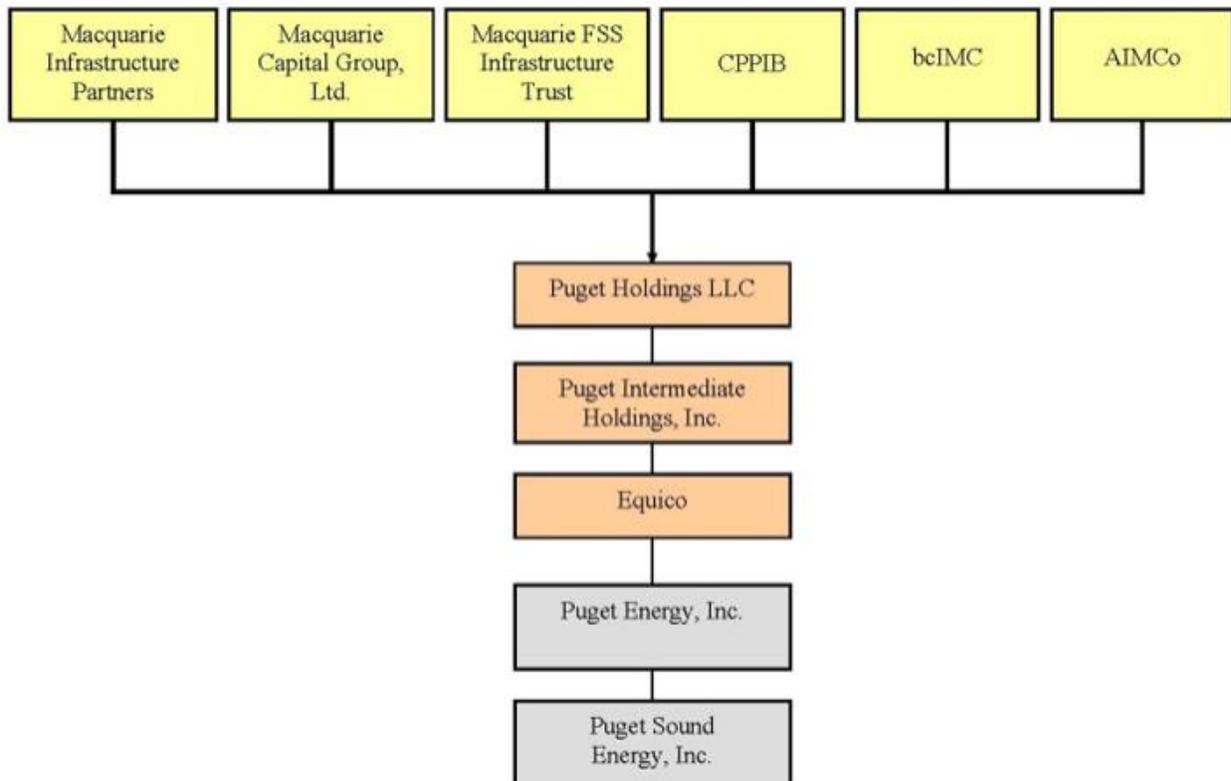
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<sup>5</sup> <https://www.sec.gov/Archives/edgar/data/81100/000119312509000402/dex991.htm>

- Macquarie Infrastructure Partners, which is comprised of three limited partnerships (i.e., Macquarie Infrastructure Partners A, L.P.; Macquarie Infrastructure Partners International, L.P.; and Macquarie Infrastructure Partners Canada, L.P.) who will indirectly invest in Puget Holdings, holds the largest single minority ownership interest at 31.8 percent.
- Canada Pension Plan Investment Board holds 28.1 percent.
- Macquarie Capital Group Ltd holds 15.9 percent.
- British Columbia Investment Management Corporation holds 14.1 percent.
- Alberta Investment Management holds 6.3 percent.
- Macquarie-FSS Infrastructure Trust holds 3.7 percent.

Although the three Macquarie entities collectively own 51.4 percent of Puget Holdings, this is not a controlling share under Puget Holdings’ governance structure, which requires a vote of 55 percent of the shares to support any action and a vote of 80 percent or more of the shares for certain significant corporate decisions.

**Organizational Chart governing Puget Sound Energy (PSE):**



**Macquarie Infrastructure Partners.** Macquarie Infrastructure Partners is a diversified, unlisted investment fund that is headquartered in New York. It focuses on infrastructure investments in the United States and Canada. The majority of its investors are US and Canadian institutions such as government pension funds, corporate pension funds, endowments, foundations and labor unions. Macquarie Infrastructure Partners currently has eleven infrastructure investments in the utility, toll road, ports and communications sectors

**Macquarie Capital Group Ltd.** Macquarie Capital Group Ltd. is a wholly owned subsidiary of the Australian-listed Macquarie Group Limited and the operating company for Macquarie Group Limited's non-banking operations. Macquarie Capital Group Ltd. often invests alongside Macquarie Group-managed funds in investments of this kind in an underwriting capacity. This is the case for Puget Holdings, and Macquarie Capital Group Ltd. expects to sell down its minority position to other Macquarie Group-managed funds or other like-minded third party investors prior to financial close or shortly thereafter.

**Macquarie-FSS Infrastructure Trust.** Macquarie-FSS Infrastructure Trust is an unlisted Australian infrastructure trust managed by Macquarie Specialized Asset Management Limited. The investment objective of Macquarie-FSS Infrastructure Trust is to make investments in a diversified range of infrastructure and related assets. It currently holds interests in five assets across sectors including communications infrastructure, vehicle inspection, utilities, and water infrastructure in three countries: the United States, Spain, and the U.K.

**CPPIB** -The Canada Plan Pension Investment Board (CPPIB)

**bcIMC** - British Columbia Investment Management Corporation (bcIMC)

**AIMCo** - The Alberta Investment Management Corporation (AIMCo)

**Equico** - following closing of the Proposed Transaction, all of the common stock of Puget Energy will be owned by "Equico," which will be a new Washington limited liability company. "Equico" will be a wholly-owned subsidiary of Puget Intermediate. "Equico" is expected to be established as a bankruptcy-remote special purpose entity, and shall not have debt.

**Puget Holdings,** which is an "Investor Consortium" (Consortium) comprised of several private equity investment companies and several government pension fund managers, all of which maintain portfolios of investments, including infrastructure investments, in the U.S., Canada, and several other nations.

**Puget Intermediate Holdings** - PSE's customers will be held harmless from the liabilities of any non-regulated activity of PSE or Puget Holdings. In any proceeding before the Commission involving rates of PSE, the fair rate of return for PSE will be determined without regard to any adverse consequences that are demonstrated to be attributable to the non-regulated activities. Any new non-regulated subsidiary will be established as a subsidiary of either Puget Holdings or Puget Intermediate Holdings Inc., rather than as a subsidiary of PSE.

## Attachment 2

### Examples of other transactions involving Macquarie that were deceptive

1. According to a Wikipedia write up on the Macquarie Group,<sup>6</sup> “Macquarie Group through its subsidiary Macquarie Equipment Rentals has allegedly been perpetrating a Telco finance scam. Macquarie Equipment Rentals has sued over 300 victims of the scam which involves bundling a finance equipment contract with a contract from a small telecommunications company, often obscuring that the finance contract exists. The scam involves the telecommunications company promising free equipment such as Plasma TVs, while offering a lower cost phone deal that offsets the cost of the equipment. The victim is then tricked into signing two contracts with the true costs often hidden, whilst being verbally promised that they will be free. The telecommunications company is paid an upfront fee by the finance company, and sometime later disappears. The victim is then left with an inflated finance company lease that requires the victim to pay often tens of thousands of dollars for equipment that in reality costs a fraction of the price.”
2. Macquarie Capital was the lead underwriter on a secondary public stock offering in 2010 by Puda Coal, which traded on the New York Stock Exchange at the time and purported to own a coal company in the People’s Republic of China (PRC). In the offering documents, Puda Coal falsely told investors that it held a 90-percent ownership stake in the Chinese coal company. Macquarie Capital repeated those statements in its marketing materials for the offering despite obtaining a report from Kroll showing that Puda Coal did not own any part of the coal company.<sup>7</sup>

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<sup>6</sup> [https://en.wikipedia.org/wiki/Macquarie\\_Group#Criticism](https://en.wikipedia.org/wiki/Macquarie_Group#Criticism)

<sup>7</sup> <https://www.sec.gov/news/pressrelease/2015-51.html>

## **Supporting Attachment No. 7**

To Comments made by Richard Lauckhart dated December 11, 2017

Setting the record straight on EE Technical Facts

## Setting the Record Straight on Energize Eastside's Technical Facts

From: Rich Lauckhart

To: city council and staff

### Executive Summary

The most important aspect of any major transmission project is the underlying technical basis for the project. PSE's Energize Eastside project is a major transmission line that will have a tremendous impact on the entire Eastside. The fact that PSE wants to collocate this high voltage transmission line within a narrow corridor with the Olympic high pressure jet fuel pipelines means that the stakes are even higher.

A project like Energize Eastside should unequivocally have clearly demonstrated need, and the supporting documentation for the project, including PSE's load flow study as well as the EIS record, should be technically and reasonably sound.

I have performed an extensive study of both PSE's load flow study and the current EIS record, and my conclusion is that both fall short, the load flow study in particular. The Eastside cities involved are proceeding with a project that does not pass the bar of clearly demonstrated need and which in my professional opinion "violates the laws of the grid". PSE's claims simply do not add up. Furthermore, the current EIS record contains information that is not technically accurate.

This paper includes a detailed discussion of the following two points:

**Assertion A: The current EIS record contains technically inaccurate information**

**Assertion B: Puget Sound Energy has never provided the actual data which would definitively demonstrate the need for Energize Eastside**

### Assertion A:

## The current EIS record contains technically unsound information

### Summary

As indicated in a number of places in the EIS record<sup>1</sup>, Energize Eastside will provide no increased reliability benefit to the Eastside. When a utility is determining the need for a new transmission line, they perform a load flow study. This is present day industry standard. The load flow study serves as the primary basis for the decision of whether or not a transmission project is needed.

The assumptions used in the load flow study that PSE claims to have run would result in power outages in the entire Puget Sound Region whether or not Energize Eastside is built. A load flow study that is run with proper grid operation assumptions demonstrates there is no need for Energize Eastside to avoid outages on the Eastside. Therefore, under the “no action” alternative, **the EIS should conclude that a decision not to build Energize Eastside will not result in any more blackouts on the Eastside than if Energize Eastside were to be built. Yet this is not what the EIS record states.**

### Background

The December 21, 2016 *Phase 2 Draft EIS – Scope of Analysis* includes a discussion of the “No Action” alternative. The following sentence is included in that discussion:

*“If no action is taken, load shedding (forced power outages within the Eastside) would likely be needed during the highest demand periods in the near future.”*

As pointed out in the rest of this report, there is no legitimate evidence on the record that this statement is true. In fact, the evidence in the record indicates that this statement is false.

### Facts

The Eastside has had numerous power outages in the past and will continue to have power outages in the future. These outages are primarily caused by wind blowing trees and limbs into the local overhead 12 KV distribution lines. Energize Eastside will do nothing to decrease these outages in the future.

PSE claims that Energize Eastside will avoid outages on the Eastside under a scenario where:

- 1) Very cold weather (i.e. 23 degrees or lower) occurs on the Eastside during morning or evening peak load hours - an event that normally occurs only once every few years
- 2) At that same time, 1,500 MW is being delivered to Canada. This is a tremendous amount of power. However:
  - a. There is no firm requirement to deliver 1,500 MW to Canada under such an

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<sup>1</sup> See (1) Lauckhart-Schiffmann load flow study dated February 28, 2016, (2) August 1, 2016 document referenced in 2a on bottom of page 2 and top of page 3 of this paper, and (3) May 31, 2016 document reference at 2 on page 4 of this paper.

event. [See comments filed to the EIS by Christina Aron-Sycz dated August 1, 2016 which includes a white paper entitled “Evidence that there is no requirement to deliver 1,500 MW to Canada on a Firm Basis-Resulting Conclusion is that Energize Eastside is not needed.”], and

- b. The entire Puget Sound Region would experience blackouts caused by insufficient voltage levels if 1,500 MW is delivered to Canada during such a cold weather event. *There simply isn’t enough power currently available that can be moved into the Puget Sound Region to serve all the load in the region (including serving all of PSE’s 1.1 million customers) during peak winter load conditions and to send 1500 MW of power to Canada. Building a new transmission line (Energize Eastside) does not bring more power into the Puget Sound Region.*
- 3) According to PSE’s needs assessment, at the same time as the above (very cold weather, 1,500 MW being sent to Canada) PSE/Quanta’s Load Flow Study assumed that six of PSE’s Puget Sound Area generators would be shut down. This is something that PSE would never do during such a cold event. Here is why:
    - a. Energize Eastside is a transmission line. Transmission lines need generation to have power to transmit. Without these six generators running, PSE would not be able to meet its own Total System Load and would be in violation of their duties.
    - b. The entire Puget Sound Region (including the service territory of PSE, Seattle City Light, Snohomish PUD, Tacoma City Light and other small utilities in the region, not just the Eastside) would experience blackouts caused by low system voltage if six Puget Sound Area generators are shut down during such a cold weather event even if 1,500 MW isn’t being sent to Canada.
  - 4) Lastly, in addition to 1) cold weather, 2) 1,500 MW being sent to Canada, and 3) six generators being offline, PSE assumes two major 230/115 KV transformers would be out of service. This is a preposterous scenario. *Since all these other things cannot happen at the same time without there being blackouts throughout PSE’s entire service territory caused by too low of voltage. This scenario makes no sense.*

**The most important thing for you to know is that the PSE scenario (described above) is a hypothetical scenario that will never occur because system operators would not allow it to happen.** If system operators allowed the system to operate in the manner that PSE postulates it used in its load flow study, the Puget Sound region in total would experience blackouts caused by low voltage. The above facts refute PSEs statement that Energize Eastside will increase the reliability of power supply to the Eastside.

Both myself and CENSE.org entered a number of documents into the EIS record that provide evidence that Energize Eastside will not reduce the number of outages on the Eastside. These documents include:

- 1) The Lauckhart-Schiffman Load Flow Study and the report associated with that load flow study. The report is titled “*Load Flow Modeling for Energize Eastside*”. It is dated

February 18, 2016.

- a. While PSE and Stantec have criticized the Lauckhart-Schiffman load flow study, these criticisms have been fully rebutted. [See attachment in email from myself to EnergizeEastsideEIS dated April 29, 2016]
  - b. In the April 29, 2016 document referenced above, I asked PSE, Stantec (the outside consulted PSE hired to perform their load flow study) and the EIS staff to provide documentation to support their attempt to discredit my load flow study. To this date neither PSE, Stantec, nor the EIS staff have produced such documentation. All indications are that such supporting documentation does not exist and that my load flow study is fully credible.
- 2) A document submitted by Christina Aron-Sycz on May 31, 2016 entitled “*Environmental Impacts if Energize Eastside (EE) is not built (i.e. “No Action” on EE)*”. This document provides a thorough analysis of the actions that would be taken if grid system operators attempted to run the system the way that PSE claims as the basis for Energize Eastside (peak demand on a very cold winter day, 1,500 MW being sent to Canada, six local generators offline, and failure of two transformers). My document fully explains that system operators would not allow the system to be run the way PSE postulates it would need to be run in order for Energize Eastside to have reliability value. **That document makes it clear that Energize Eastside provides no measurable reliability benefit to the Eastside and that blackouts will not occur if Energize Eastside is not built.**

### **Conclusion**

The scenario that PSE claims as the basis for Energize Eastside could never happen because it violates the “laws of grid operation”. Therefore PSE has no legitimate claim to build an eighteen mile, 230 kV transmission line through the heart of your communities. PSE claims that this high voltage power line is needed to increase the electrical reliability of the Eastside. These claims are false because the basis used to justify its need is impossible. The Lauckhart-Schiffman Load Flow Study (which uses PSE’s own Base Case data set for heavy winter loading in the winter of 2017-18) demonstrates that Energize Eastside will provide no measurable reliability benefit to the Eastside. **Therefore, the No Action alternative will not result in any blackouts caused by load shedding on the Eastside or elsewhere on the grid and the December 21, 2016 statement by EIS staff is incorrect.**

### **Assertion B:**

## **Puget Sound Energy has never provided the actual data which would definitively demonstrate the need for Energize Eastside**

### **Summary**

Power companies are required by the federal government to be able to provide continuous electricity even in stressed conditions. However, as soon as I read PSE's basis for the need for Energize Eastside (as described below), I realized that something was amiss. PSE is not required by any federal, state or local authority to build their grid to this level of preparedness. Meeting federal criteria is essential. The scenario above can only be described as a "doomsday" scenario. Allowing a power company to build their grid to meet a "doomsday" scenario results in investing hundreds of millions of dollars in a red herring project and needlessly subjecting communities to significant negative environmental impacts.

### **Background**

Utilities demonstrate the need for transmission lines using a "load flow study." This is a computer simulation of how the complex electrical grid operates under various scenarios. PSE has in-house experts that normally perform these studies.

However, in 2013, PSE took the unusual step of hiring an outside consultant, Quanta, to perform a load flow study to prove the need for Energize Eastside. In my entire career at Puget Power (PSE's predecessor), load flow studies performed to assure our own system was reliable were never outsourced.

### **PSE/Quanta's basis for the need for Energize Eastside**

Quanta concluded that PSE's equipment might overload under a combination of four extraordinary conditions:

- peak usage time on a very cold winter day (23 degrees or lower)
- simultaneous failure of two transformers
- at the same time, a huge amount of electricity is being transmitted to Canada (1500 MW)
- and six local generation plants are shut down, even though they were built for the specific purpose of providing power at peak load times (I oversaw the acquisition and building of these plants).

I decided to dig deeper into Quanta's load flow study to view it from all angles. I have overseen dozens of load flow studies on this exact same grid. To understand how the area's grid operates under this very unlikely scenario, I asked to see Quanta's load flow study. PSE declined multiple requests, each time citing reasons that were essentially baseless.

PSE's refusal to show their only load flow study did not deter me but rather compelled me even more to continue my research.

In December 2015, I performed my own load flow study with another transmission expert, Roger Schiffman. We were able to use the same software and same base case data that PSE's consultant had. **Our results show that the consultant's modified base case scenario violates fundamental limitations of the Northwest power grid and could lead to widespread power outages.** Most importantly, our study concludes that building eighteen miles of 230 kV lines through the heart of the Eastside (Energize Eastside) is not a necessary component to provide power to the Eastside and will not improve reliability in any measureable way. Furthermore, Energize Eastside will do nothing to prevent the most common type of blackouts - trees and limbs causing problems with the distribution system.

This remainder of this paper explains why it is important for a truly independent expert to verify the details of this important study, and how other factors lead to the conclusion that Energize Eastside is not necessary to serve the Eastside's energy needs.

### **Load flow models and the Pacific Northwest Grid**

Transmission planning is accomplished by running load flow models<sup>2</sup>. The terms "load flow study" and "load flow model" are interchangeable. PSE has stated that "The computer model used for system planning is one that is used throughout western North America."<sup>3</sup> The system planning computer model needs a very large amount of data on the entire interconnected electrical grid.

PSE's transmission lines are an integral part of the entire electrical grid in the Western Electricity Coordinating Council (WECC) Region. The WECC Region extends from Canada to Mexico and includes the provinces of Alberta and British Columbia, the northern portion of Baja California, Mexico, and all or portions of the 14 states between. In order for utilities to get the needed data to run these load flow models, the WECC collects the needed data from each of the utilities in the region and compiles a database that can be used to study the grid. The Federal Energy Regulatory Commission (FERC) requires that every utility develop Base Cases to show how the system will operate in the future so that third parties can review and modify these Base Cases if they believe modifications should be made. In the WECC region, the WECC creates these Base Cases and files these Base Cases with FERC. PSE files these same Base Cases (the WECC Base Cases) with FERC in order to comply with FERC's requirement that every utility file Base Cases with FERC. I asked for and received the PSE Base Cases and Lauckhart-Schiffman used these Base Cases in their analysis.

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<sup>2</sup> Load Flow analysis and Power Flow analysis are two different ways of referring to the same analytic process. The load flow model itself is a mathematical simulation of all the components of the interconnected electric system that provides flows and other physical conditions on each of the elements of the interconnected transmission grid.

<sup>3</sup> [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/phase\\_1\\_draft\\_eis\\_scoping\\_report.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/phase_1_draft_eis_scoping_report.pdf) at page 15.

### **PSE's Needs Assessment**

The Eastside Needs Assessment report prepared by PSE and Quanta was based on a load flow study which looked at the reliability of the transmission grid on the Eastside under heavy loading conditions in the winter of 2017-18. The load flow study was conducted by Quanta, a consulting firm headquartered in North Carolina.

### **CEII clearance granted to me by the Federal Government**

In July of 2015 I applied for and was granted CEII [Critical Energy Infrastructure Information] clearance from FERC. After that I asked FERC to allow Roger Schiffman and Don Marsh to be included in my CEII clearance. FERC approved my requests. CEII clearance gives us the authority to access and review the Load Flow Base Case data files that PSE files with FERC.

We submitted our CEII clearance letters to PSE and asked for access to the Quanta load flow study.

PSE refused to share Quanta's Load Flow study with both myself and Don Marsh which would have allowed us to perform an even deeper review of the need for the Energize Eastside project. PSE's refusal cited that we may use the data to find weaknesses in the grid which will allow us to perform terrorist outages on the grid. However, FERC's CEII clearance letter stated that neither Don Marsh nor myself are considered terrorists and FERC has also stated that we have a legitimate need to see the load flow data.

FERC has gone so far as to provide both myself and Don Marsh a number of sets of load flow data that include data on PSE's system and every other system in the WECC.

In the Macquarie/PSE/Quanta load flow study performed in the Eastside Needs Assessment, PSE/Quanta took the WECC Base Case and made modifications to it. We know this because when we ran our own study, everything checked out. Yet PSE claims their load flow study resulted in significant outages. This could only happen if PSE had Quanta make alterations to the Base Case data files that they filed with FERC.

PSE's claim that it will not provide its load flow study (and therefore its modifications to the WECC Base Case) because of terrorism concerns is patently baseless. FERC has already provided the information that I or Don Marsh would need to perform terrorist activities if we were so inclined, which we are obviously not. Furthermore, Don Marsh and I have signed agreements with FERC that we will not use the information granted for nefarious purposes.

As indicated below, I believe that the real reason that PSE has chosen not to provide its load flow study is that there is a high likelihood that PSE has artificially and inappropriately made modifications to the Base Case that are outside of the realm of acceptable behavior by a utility.

### **Critical problems with assumptions in the Quanta load flow study**

PSE already had a Base Case filed with FERC for heavy loading conditions in the winter of 2017-18. But rather than using the parameters in that base case, Quanta made major adjustments to it. According to the Eastside Needs Assessment report, Quanta made at least two changes to the Base Case that are highly problematic:

- Quanta shut down 1,340 MW of generation located in the Puget Sound area (six generation plants) when, in the Base Case filed with FERC, all of these generators were running.
- Quanta increased the flow of power to Canada from 500 MW to 1,500 MW.

Then, in order to comply with reliability criteria that says the system should be able to survive the failure of up to two elements on the grid (N-2 or N-1-1), Quanta eliminated one 230/115 KV transformer at its Sammamish Transmission station and eliminated one 230/115 KV transformer at its Talbot Hill Transmission Station.

### **Further problems with the Quanta study**

There are a number of other problems with the Quanta load flow studies as follows:

- Lack of accounting for needed power generation
  - Quanta said nothing about how PSE would source its total system generation need of 6,500 MW<sup>4</sup> in heavy winter conditions in 2018 if it shut down nearly 1,400 MW of PSE generation resources (the six generation plants) in the Puget Sound region. PSE's Integrated Resource Plan (IRP) indicated that PSE does not have enough firm supply lined up to cover its 2018 needs even if all of the PSE resources in the Puget Sound Area were operating. The IRP indicates a PSE shortfall of 2,000 MW in 2018 even if all of its resources are operating. If another 1,340 MW is not operating during the peak (the six generation plants that Quanta assumes are offline), then that shortfall grows to a whopping 3,340 MW. A shortfall that is more than 50% of its total need. The Eastside Needs Assessment makes no mention of how Quanta thinks PSE would meet its peak generation need under this extreme shortage condition.
- Illegitimate changes to Canadian power flows
  - Quanta said nothing in the Eastside Needs Assessment about why it decided to increase the flows to Canada to 1,500 MW. In later statements, PSE has indicated that a 1,500 MW flow to Canada is required by the Columbia River Treaty. But that is patently false.
    - The Treaty was signed in the 1960's. The delivery of power to Canada as a result of this treaty were, according to the terms of the treaty, supposed

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<sup>4</sup> Includes required Planning Margin and Operating Margin

to be accomplished by Bonneville Power Administration building a new transmission line in eastern Washington north to the Canadian border near Oliver, BC, east of the Cascades. Also according to the treaty, BC Hydro was then supposed to build from their system in British Columbia to meet the new BPA line. Under that plan, there would be no impact on transmission in Western Washington and PSE ratepayers would not be financially responsible to fulfill the Columbia River Treaty, which, it being an international treaty, is the financial duty of the federal government (of which BPA is an entity). But for the first thirty years of the Columbia River Treaty, Canada chose not to receive the power but instead sold it on the firm power market to US entities.

- Then, in the 1990's as those thirty year sales agreements to US entities were about to expire, both parties (BPA and Canada) decided to see if they could continue to operate without building the twin transmission lines to Oliver (as originally intended in the treaty). To determine if this was possible, BPA ran load flow studies to determine if any issues would arise on the grid if the joint lines to Oliver were never built. BPA's Record of Decision (ROD) that resulted from those studies made a comparison of the "Oliver plan" with a plan that did not include building Transmission to Oliver. That ROD stated the following<sup>5</sup>:
  - In order for at least partial treaty deliveries to be made at Oliver (in accordance with the original treaty), the US would need to build "One new single-circuit 500 -kilovolt (kV) line from Grand Coulee or Chief Joseph Substations to the United States/Canada border near Oliver by 2003" and Canada would need to build "Border-to-Oliver: One new single-circuit 500-kV line and substation by 2003".
  - Alternatively, in order for full delivery of Canada's share of treaty power to be delivered to Blaine and Selkirk,
    - o "one cross-Cascades 500-kV transmission line would be accelerated 6 or 7 years under an Eastside generation scenario" and,
    - o "a second cross-Cascades line might also be accelerated."
- After completion of the ROD and an evaluation of these findings, the original treaty with Canada was modified to remove the US requirement to build to Oliver. Canada was allowed to continue to sell its share of treaty power in the United States on a short term basis. Canada retained the right to request that its share of treaty power be delivered to Canada on any hour at the Blaine and Selkirk points of delivery; however, if the

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<sup>5</sup> United States Entity US Department Of Energy, Bonneville Power Administration US Army Corps of Engineers, North Pacific Division Delivery of the Canadian Entitlement Final Environmental Impact Statement Record of Decision <https://www.bpa.gov/news/pubs/RecordsofDecision/rod-19961108-Delivery-of-the-Canadian-Entitlement-Final-Environmental-Impact-Statement.pdf.pdf> at page 8.

grid could not accommodate full delivery on any hour (e.g. because the new Cross Cascades lines had not been built), then it would not be delivered to Canada.<sup>6</sup>

- These new cross cascades line have not been built nor is there any written plan to do so in the future.
- Furthermore, Canada (through BC Hydro, Canada’s power utility) has stated that it does not include its share of treaty power in the Load/Resource Balance in its IRP because the British Columbia Utilities Commission (BCUC) does not consider it a suitable source of dependable capacity.<sup>7</sup> This means that Canada’s internal power planning structure does not formally depend on any transfers of power from the US to Canada.

There is other evidence that there is no requirement to deliver 1,500 MW to Canada. See Attachment 1, which document was filed in the EIS comment period.

### **PSE’s/Quanta’s study defies the “laws of the grid”**

Loads in the Puget Sound region (including PSE’s loads) are served by generation located in the Puget Sound region as well as generation located east of the Cascades which are transmitted to the Puget Sound region on the eleven transmission lines that cross the Cascades. There is a limit on the amount of power that these eleven lines can carry west across the Cascades from eastern Washington to the Puget Sound area. There are mathematical limits to the number of megawatts of power that can be moving on these lines - the “laws of the grid”, if you will. The load in the Puget Sound region is greatest in a cold winter scenario. The PSE Base Case load flow for heavy winter conditions in 2017-18 showed very high loading on the eleven cross-Cascades transmission lines, even with all the Puget Sound generation running and with only 500 MW flowing to Canada. In our load flow study, Lauckhart & Schiffman attempted to increase the flow to Canada in this Base Case from 500 MW to 1,500 MW. The computer model found an unacceptable problem on these eleven cross cascades lines. Then, Lauckhart & Schiffman left the flow to Canada at the 500 MW level reflected in PSE’s Base Case, but then shut down the 1,340 MW of Puget Sound Area generation that Quanta mentions in the Eastside Needs Assessment. Again the computer model found an

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<sup>6</sup> 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 at paragraphs 8 & 9.  
[http://www.bcuc.com/Documents/Proceedings/2006/DOC\\_10966\\_B1-131\\_Columbia%20River%20Treaty%20Agree.pdf](http://www.bcuc.com/Documents/Proceedings/2006/DOC_10966_B1-131_Columbia%20River%20Treaty%20Agree.pdf)

<sup>7</sup> See BC Hydro November 2013 IRP, Chapter 2 at page 2-20.  
<http://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/integrated-resource-plans/current-plan/0002-nov-2013-irp-chap-2.pdf>

unacceptable problem on these eleven cross-Cascades lines. You can see how the computer model gets extremely problematic if both assumptions are changed at the same time. Under either of these scenarios, it is important to note that all of PSE's service territory would experience blackouts caused by low voltage, not just the Eastside. Despite numerous requests for explanation by myself and Don Marsh, PSE/Quanta have never said how they addressed these problem in their load flow analysis. The Bellevue city council claims they have requested an explanation of this from PSE, but I know of no response to this request or whether it was in fact actually requested.

### **PSE's stated "electrical criteria" used in their Eastside Needs Assessment**

PSE has not provided the load flow study that Quanta ran that attempts to justify Energize Eastside. The Lauckhart-Schiffman load flow study report raises serious questions about how Quanta conducted its load flow study to prove the need for Energize Eastside. To try to understand why PSE's/Quanta's load flow study deviates from the WECC Base Case, one can look to the eleven "electrical criteria" listed in the Eastside Needs Assessment that PSE claims as their basis for this project. To the layperson, the electrical criteria laid out by PSE cites seem reasonable. However, to my experienced eye, these electrical criteria reveal that PSE/Quanta made unacceptable modifications to its study. Specifically, I believe that they failed to adhere to industry standards and are attempting to override the "laws of the grid". See Attachment 2.

By contrast, the Lauckhart-Schiffman load flow study does adhere to the "laws of the grid" and follows industry standards for studying the reliability of power service to the Eastside. The Lauckhart-Schiffman study demonstrates that Energize Eastside is not only not needed, it also shows evidence that the PSE/Quanta studies used to justified Energize Eastside defy the "laws of the grid".

### **PSE refuses to discuss these matters with me**

I have made numerous attempts to reach out to PSE to discuss all of these matters in person or at least by phone. However, PSE has repeatedly stated that they are not available or not interested.

Despite contrary statements by PSE to the city staff, I harbor no ill will against PSE. It may be hard to believe in this day and age that an individual would devote as much time and energy as I have to studying this project without some kind of ulterior motive. I am a naturally intellectually curious individual and had I seen evidence at the outset that Energize Eastside was simply another important piece in the framework of the Eastside's grid, I would have moved on. However, my deep knowledge of Pacific Northwest transmission planning and my own conscience compel me to make the public, and especially the decision makers, aware of just how flawed this project is.

## **Conclusion**

PSE has not provided the load flow study that it claims demonstrates the need for Energize Eastside. The Lauckhart-Schiffman load flow study, which is based on the heavy winter 2017-18 Base Case that PSE submitted to FERC, demonstrates that Energize Eastside is not only not needed but defies the “laws of the grid”. PSE has openly criticized the Lauckhart-Schiffman load flow study for running all the Puget Sound area generation and for not sending 1,500 MW to Canada. But as described in this paper, the Lauckhart-Schiffman assumptions on these matters are more defensible than the assumptions that Quanta used in its load flow analysis. In fact, it is highly unclear how Quanta was able to resolve the cross-Cascades power flow problems that would arise under their assumptions. It simply does not add up, and I compel you to not accept this project at its face value. Your communities are depending on you. I am more than willing to provide you with assistance, at no cost, to help study this further.

## Attachment 1

### White Paper

#### Evidence that there is no requirement to deliver 1,500 MW to Canada on a Firm Basis.... Resulting Conclusion is that EE is not needed

PSE attempts to justify the Energize Eastside line by stating that PSE is required to deliver 1,500 MW to Canada on a very cold winter day during the peak load hour at the same time that 1,400 MW of local generation is not running and two major transformers on the Eastside fail.

**That there is no Firm Requirement to deliver 1,500 MW to Canada (e.g. under these extreme conditions) is evident from a number of standpoints as follows:**

- 1) Any Firm Requirement to deliver 1,500 MW to Canada would be evidenced by the existence of a contract that shows such a requirement. No one has produced a contract that includes such a requirement. The EIS record includes a request that either PSE, or Stantec, or the Bellevue EIS staff produce such a contract. No such contract has been produced. We believe there is no such contract.
- 2) FERC has stated *“The record before us shows that the Energize Eastside Project is located completely within Puget Sound’s service territory, ... and that neither Puget Sound, nor any other eligible party, requested to have the project selected in the regional transmission plan for purposes of cost allocation; therefore, the project is not subject to the Order No. 1000 regional approval process.”* For these stated reasons, FERC does not consider the EE line to be a FERC jurisdictional line. Instead FERC calls it a line for local need. **From this FERC finding it is clear that 1,500 MW to Canada (a Regional flow matter) should not be reflected in the study of the need for EE because PSE never requested the EE line be selected in a regional transmission plan.**
- 3) There have been unsupported claims that the Columbia River Treaty requires PSE (or BPA or some unknown entity) to deliver 1,500 MW to Canada. However that is not true as evidenced by:
  - a. The treaty deliveries to Canada were by its terms supposed to be accomplished by BPA building a new transmission line in Eastern Washington north to the Canada border near Oliver, BC, east of the Cascades. BC Hydro was supposed to build from their system in British Columbia to meet the new BPA line. Under that plan, there would be no impact on transmission in Western Washington and PSE ratepayers would have paid nothing to cause the Columbia River Treaty benefits to be moved to Canada. But for the first thirty years of the Columbia River Treaty, Canada’s share of Treaty power was sold “Firm” for 30 years to US entities. In 1998 when those sales to US entities expired, the Treaty was amended to eliminate the requirement to build transmission to Oliver in exchange for giving Canada the right to sell its share of Treaty power in the future to US entities on a

short term basis.

- b. The 1998 amendment to the treaty stated that if Canada later decided it wanted its share of Treaty Power to be delivered “Firm” to Canada, then Canada needed to ask BPA to study to determine what work would need to be done on the transmission grid to make that happen. After that study, if Canada was willing to pay money for those transmission improvements, then the Treaty power would be delivered “Firm” to Canada. **Canada has never made such a request to have its share of Treaty power delivered to Canada on a Firm Basis as evidenced by BPAs response to a Public Record Act request to search the BPA Transmission Request Queue to locate any such request from Canada. BPA stated that it did not find any such request.**
  - c. BPA has known since at least 1998 (when the treaty was amended) that it would not be able to deliver Canada’s share of downstream benefits to Canada under all weather and contingency conditions. In 2009, Puget Sound Area Study Group members developed a draft report entitled “Assessment of Puget Sound Area/Northern Intertie Curtailment Risk.” That study describes certain system operating plans that could reduce the Curtailment Risk in the south-to-north direction on the tie to Canada.
- 4) On May 13, 2015 Mike Brennan was asked to have Peter Mackin of USE please provide the Firm Transmission Service that would be relevant for his load flow studies. In other words, please provide a copy of any and all contracts that Peter is aware of under which BPA has contracted to provide Firm Transmission Service in the northerly direction over this line. It has been over a year since this request was made and no response has been provided. We believe no response was provided because no such contract exists.
  - 5) Gary Swofford, 38 year Puget employee who recently retired as Chief Operating Officer of PSE VP of PSE, spoke to the Bellevue City Council on December 14, 2015 and stated that “nothing could be further from the truth” than a claim that Energize Eastside is being built to deliver 1,500 MW to Canada. He claims the need for Energize Eastside is simply an eastside load matter. However, apparently unknown to Mr. Swofford, neither the USE load flow study nor the Lauckhart-Schiffman study shows a need for Energize Eastside if 1,500 MW does not need to be delivered to Canada. PSE has never produced a load flow study that says otherwise.
  - 6) PSE claims that NERC/FERC reliability criteria require 1,500 MW to be delivered to Canada. The EIS record includes a request that either PSE, or Stantec, or the Bellevue EIS point to specific language in NERC/FERC reliability criteria that describes such a requirement. PSE generally refers to NERC/FERC Reliability Criteria TPL-001. But TPL-001 is a 20 page document and no one has pointed to specific language in TPL-001 that describes such a requirement. There is a reference in TPL-001 to Firm Commitments, but **no one has shown a contract under which a Firm Commitment to deliver 1,500 MW to Canada exists.**
  - 7) Any Firm Contract to deliver 1,500 MW to Canada would be subject to FERC jurisdiction. Any requirement under NERC/FERC Reliability Criteria would also be subject to FERC jurisdiction. If PSE believes that a denial of their permit to build EE would violate a Firm Contract to deliver 1,500 MW to Canada or would violate a NERC/FERC Reliability Criteria, then PSE should have requested that FERC make such a finding in CENSE’s Complaint at FERC. FERC made no such finding in their Order on CENSE’s complaint. In fact, to the contrary, FERC stated it had no

jurisdiction over the EE line.

- 8) The Western Electricity Coordinating Council (WECC) prepares the Base power flow cases for use by western North America power companies such as PSE to help them study the grid and its reliability. WECC prepared Base Case load flow studies for the heavy winter loading conditions for the winter of 2018. WECC ran all of the Puget Sound gas fired generation and transferred 500 MW of power to Canada in that case. The reason WECC did not transfer more power to Canada in its Base Case is that problems occur on the grid if that happens. WECC did not state that the case was not compliant with FERC reliability criteria because WECC did not see a Firm Commitment to deliver 1,500 MW to Canada.
- 9) The Lauckhart-Schiffman load flow study effort attempted to modify the WECC heavy winter load base case for the year 2018 by increasing the flow to Canada. When they attempted to do this, the load flow study could not find a solution to satisfactorily meet reliability criteria. This was true whether or not the Energize Eastside line was included in the load flow data set being used. Simply put, the loading on the eleven transmission lines crossing the Cascades from the Columbia River to Western Washington could not handle the loading that would be necessary to delivery 1,500 MW to Canada, whether or not the Energize Eastside line is built. And this is true even with all the Puget Sound Area gas fired generation is operating. Clearly it would take a major new transmission line crossing the Cascades (or a new line to Oliver from eastern Washington) for 1,500 MW to be delivered to Canada on a Firm Basis.
- 10) CENSE has made Herculean efforts to get PSE to divulge its load flow study showing a need for the line. PSE has created a series of excuses for not showing CENSE and its experts its studies. The experts retained by CENSE believe that the real reason that PSE has chosen not to provide its studies is that any such study that they might have is artificially/inappropriately made in some fashion.
- 11) PSE refuses to show its load flow studies to the experts retained by CENSE because they fear that those experts may use the data to find weaknesses in the grid which will allow them to perform terrorist outages on the grid. FERC has stated that the CENSE experts are not considered terrorists and FERC has stated that the CENSE experts have a legitimate need to see the load flow data. In fact, FERC has provided the CENSE experts a number of sets of load flow data that include data on PSE's system and every other system in the WECC. PSE's claim that it will not provide its modifications to the WECC load flow cases because PSE is concerned about terrorist activities rings untrue. FERC has already provided the information that CENSE's experts would need to perform terrorist activities if they were so inclined. Nothing PSE would provide would give any additional help. But CENSE's experts have signed agreements with FERC in which they promise not to use the data provided them for any nefarious purpose.

Bottom line:

- a) It is clear that there is no Firm Requirement to deliver 1,500 MW to Canada.
- b) It is clear that the grid cannot deliver 1,500 MW to Canada in an extreme cold situation with or without the Energize Eastside line.
- c) **It is clear from (a) the U.S.E. and (b) the Lauckhart-Schiffman load flow studies that Energize Eastside is not needed if 1,500 MW is not being delivered to Canada.**

## Attachment 2

**PSE “Electrical Criteria” hints at how Quanta ran the load flow model that PSE claims justifies EE**

### **“An inappropriate load flow study”**

The Eastside Needs Assessment report prepared by PSE and Quanta states that PSE/Quanta ran a load flow study that concluded that EE is needed in order to reliably serve power to the Eastside. But PSE has refused to show the data from its load flow study. Lauckhart & Schiffman ran a load flow study that concluded that EE was not needed. Lauckhart-Schiffman load flow study was performed using the Base Case load flow study that PSE files with FERC. The Lauckhart-Schiffman load flow study report indicates that if NERC/FERC reliability standards are followed, EE is not needed. Further, the Lauckhart-Schiffman study questions how the PSE/Quanta load flow study could have been made to work given the problems with the loading on the eleven transmission lines that cross the Cascades to northwest Washington from the vicinity of the mid-Columbia River.

By looking at the 19 criteria listed In Chapter 2 of the Phase I Draft EIS, it is possible to make a reasonable guess of how PSE/Quanta ran its load flow study. Assuming this reasonable guess is correct, the PSE/Quanta load flow study that was used to justify EE is plainly inappropriate for this purpose.

The “reasonable guess” is made as follows:

a) PSE stated Criteria number 7: *“Adjust regional flows and generation to stress cases similar to annual transmission planning assessment.”* ColumbiaGrid had run a “stressed load flow case” **for information purposes** just to see how the system would respond if the Base Case was adjusted to significantly increase stresses on the system. Columbia Grid indicated that this stressed case caused significant adverse impacts on the system but there was no need to make any fixes to the system to address those problems as a result of this stressed case run because **the case exceeds the NERC Reliability Criteria.**<sup>8</sup> *[Having a model of the system allows the user to look at any scenario they want. In this case, apparently some party wanted to look at a very stressed condition...so it was run. But the probability of those set of assumptions is excessively low. And neither FERC nor NERC nor ColumbiaGrid (nor any rational person) believe*

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<sup>8</sup> Ten-year extra heavy winter: 2017-18HW2 with loads increased to model five years of load growth plus approximately 12% addition to load represent an extra heavy (5% probability of occurrence) load for 2023, Boardman and Centralia #1 were removed, Centralia and Port Westward CTs were added as in the heavy summer case, transfers from California were increased to make up the difference in load and generation. **The Northwest to British Columbia transfer was increased to 1500 MW and the West of Cascades North transfer was increased to near its limit (10,200 MW) by reducing local west side gas generation. This case is being studied for information purposes and mitigation is not required as it goes beyond what is required in the NERC Reliability Standards.** [ColumbiaGrid 2013 System Assessment Pg 12]

that it makes sense to fix the system for this extremely low probability event. That is why ColumbiaGrid did not look to find fixes to the problems under this scenario. However, PSE has made this the main scenario for looking at the need for Energize Eastside - that makes no sense.]

b) As demonstrated by the Lauckhart-Schiffman report, the load flow model will not run under this scenario because of the problems that are created on the grid unless other changes to the data base are also made. From this same "PSE Criteria" document we can get some insight into how Quanta may have made the load flow model run.

c) PSE stated Criteria number 8: *"Take into account future transmission improvement projects that are expected to be in service during the study period."*

d) PSE stated Criteria number 2: The "Study Period" was from 2015-2024.

e) It appears that PSE thinks that sometime prior to 2025 someone will build one or two new Cross Cascade lines. But no one is announcing today they intend to build new Cross Cascade lines. PSE may speculate they will be built, but there is no compelling evidence they will be.

Bottom Line:

In a nutshell PSE/Quanta have decided to run a Load Flow study to determine the need for EE, which load flow study has major flaws.

- First it starts with a Scenario that has negligible probability of occurring
- A Scenario that vastly exceeds FERC/NERC reliability criteria.
- Then in order to make that Scenario work electrically, Quanta seems to have modeled new Cross Cascades transmission lines that no one is working on.
- And no one is working on them because any scenario that is consistent with FERC/NERC reliability criteria says the new Cross Cascades transmission lines are not needed.

This load flow study is completely inappropriate for studying the reliability of power service to the Eastside. The Lauckhart-Schiffman load flow study is the appropriate way for studying the reliability of power service to the Eastside. That study demonstrates that EE is not needed.

## **Supporting Attachment No. 8**

To Comments made by Richard Lauckhart dated December 11, 2017

Comments I made to ColumbiaGrid pointing out the error in their System Assessment write-up regarding the need to deliver 1,350 MW of Treaty power to the Canadian border

1:30 PM to 3:30 PM

- 1) Did ColumbiaGrid perform load flow studies that show the need for Energize Eastside? We don't think so. But the ColumbiaGrid 2017 System Assessment suggests that ColumbiaGrid ran load flow studies that show the need for Energize Eastside. If so, we would very much like to see those studies to see how ColumbiaGrid might have shown the need for Energize Eastside without using bad modeling assumptions. **I have provided comments/questions to ColumbiaGrid that address that and related questions. I look forward to seeing ColumbiaGrid's responses to the comments/questions I sent them.** Those comments/questions have been provided for the record in this WUTC proceeding Docket No. 170791. *[It is clear to us that the PSE/Quanta load flow study allegedly showing the need for Energize Eastside was done with bad modeling assumptions.]*
  
- 2) One of the big questions relates to whether or not there is a **Firm** Requirement for BPA or some US Entity to deliver 1,350 MW of Treaty Entitlement Power to the Canada border.
  - a. PSE has stated that ColumbiaGrid requires PSE to include a delivery of 1,350 MW of Entitlement Power to the Canadian border when PSE studies the local area transmission needs on the PSE system. Of course, ColumbiaGrid does not have the authority to require PSE to build local transmission to cause increased capability to deliver Treaty power to the Canada Border.
  - b. The ColumbiaGrid Draft 2017 System Assessment states that there is a 1,350 MW Canadian Entitlement South to North commitment to deliver power at Blaine and Nelway. But ColumbiaGrid has provided no evidence that such a commitment exists.
  - c. **I have also written ColumbiaGrid providing evidence that demonstrates from Treaty documents that such a Firm Commitment does not exist.** That writing has been provided for the record in this WUTC proceeding Docket No. 170791. ColumbiaGrid needs to correct its erroneous statement in the ColumbiaGrid 2017 System Assessment (and anywhere else it makes the statement) that there is a 1,350 MW Canadian Entitlement South to North commitment to deliver power to the Canadian Border. **I look forward to those corrections being made.**
  
- 3) **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)..**

- 4) I have indicated a willingness to meet with ColumbiaGrid to go over my several comments/questions and evidence. ColumbiaGrid has not yet accepted my invitation.

## **Supporting Attachment No. 9**

To Comments made by Richard Lauckhart dated December 11, 2017

Evidence that ColumbiaGrid had no substantive role in determining the need for EE

## **Evidence that ColumbiaGrid had no substantive role in determining the need for Energize Eastside**

ColumbiaGrid actions indicate that PSE/Quanta did not do correct studies

The following facts are relevant to the question of whether or not there is any proof of the need for Energize eastside:

1. ColumbiaGrid has not performed any analysis that demonstrates the need for Energize Eastside. FERC has stated that since PSE did not request that Energize Eastside be a part of a regional plan that ColumbiaGrid had no obligation to perform load flow studies on the need for ColumbiaGrid in an Open and Transparent fashion with stakeholder input. When specifically asked last month if the need for Energize Eastside was studied by ColumbiaGrid, ColumbiaGrid refused to answer saying that FERC had ruled on that question in the FERC Order by pointing out that PSE had not requested that Energize Eastside be a part of a regional plan.
2. PSE has stated that ColumbiaGrid requires PSE to include a delivery of 1,350 MW of Entitlement Power to the Canadian border when PSE studies the local area transmission needs on the PSE system.<sup>1</sup> But when ColumbiaGrid was asked to provide proof that there is a Firm Commitment by BPA (or anyone else in the United States) to have Entitlement Power delivered to the Canadian border, ColumbiaGrid did not provide such proof. And when ColumbiaGrid was provided clear evidence in Treaty Documents that there is no Firm Commitment by BPA (or anyone else in the United States) to deliver Entitlement Power to the Canadian border, ColumbiaGrid declined to attempt to contradict this evidence.
3. When ColumbiaGrid does its studies of the adequacy of the transmission grid during winter peak events, ColumbiaGrid assumes that 1,680 MW of PSE owned/controlled Puget Sound Area generation is running. This is the standard method to study heavy winter conditions in the Northwest because the Northwest is a winter peaking region. PSE cannot meet its winter system peak load without all this generation running. But when PSE/Quanta ran load flow studies in the Eastside Needs Assessment, PSE only ran 259 MW of this 1,680 MW of generation. ColumbiaGrid was asked if there would be a reasonable explanation for PSE making its assumption and ColumbiaGrid had no response.
4. If PSE would have requested that Energize Eastside be a part of a regional plan, then ColumbiaGrid would not only have made load flow runs [on the need for Energize Eastside in an Open and Transparent fashion with stakeholder input], but also the FERC required cost allocation activity would have required that ColumbiaGrid do analysis to see which entities in ColumbiaGrid would pay what part of the Energize Eastside project. If Energize Eastside was

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<sup>1</sup> The Booga Gilbertson March 23, 2016 letter provided to the IRPAG group by Jens Nedrud on May 4, 2017 states in part "Flows to and from Canada are set by the regional planning authority (ColumbiaGrid) in conjunction with other regional utilities.....This is the modeling requirement – a requirement that is spelled out quite clearly in ColumbiaGrid's Biennial reports." The Booga Gilbertson letter was rebutted shortly after she sent it in 2016.

being built in part to help BPA increase its ability to deliver Canadian Entitlement power to the Canadian border, then the FERC/ColumbiaGrid required cost allocation analysis would have had BPA pay the lion share of the cost of Energize Eastside. But ColumbiaGrid did not perform those studies. Instead, in a set of separate negotiations, PSE agreed that BPA would contribute nothing to the cost of Energize Eastside.

**In summary**, ColumbiaGrid had no substantive role in determining the need for Energize Eastside. The PSE/Quanta approach to evaluating the adequacy of the transmission grid does not follow the ColumbiaGrid and industry standard of running all Puget Sound Area generation during a winter heavy load event. If ColumbiaGrid told PSE that ColumbiaGrid requires PSE to include a delivery of 1,350 MW of Entitlement Power to the Canadian border, as stated in the footnote 1 referenced Booga Gilbertson letter, then ColumbiaGrid was wrong in saying that. And ColumbiaGrid was not being consistent with the fact that PSE had not requested that Energize Eastside be a part of a regional plan. Further, ColumbiaGrid did not perform the cost allocation studies it would have needed to provide if ColumbiaGrid had played a substantive role in determining the need for Energize Eastside.

The PSE/Quanta Eastside Needs Assessment load flow studies incorrectly included a requirement to deliver 1,350 MW of Entitlement Power to the Canadian border and incorrectly shut down 1,421 MW of PSE's Puget Sound Area generation. These assumptions alone demonstrate that the load flow studies done by PSE/Quanta were done incorrectly. There is also evidence that other input assumptions used by PSE/Quanta were likely not correct, but PSE refuses to show the data it used in the PSE/Quanta load flow studies. Load flow studies correcting the problematic PSE/Quanta assumptions demonstrate that Energize Eastside is not needed.

Richard Lauckhart  
Energy Consultant  
Davis, California

August 1, 2017

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

## **Supporting Attachment No. 10**

To Comments made by Richard Lauckhart dated December 11, 2017

Email describing alternatives that would be better than EE if in the future there is a need for reliability improvements on the Eastside

**From:** [Richard](#)  
**To:** [UTC DL Records Center](#)  
**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](#); [Frankiewicz, 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 \(UTC\)](#); [Michele](#)  
**Subject:** Alternatives to Energize Eastside....  
**Date:** Monday, August 14, 2017 8:47:39 AM  
**Attachments:** [Comment on Phase 2 Draft EIS Section 2.2.1 Seattle City Light Transmission Line option.pdf](#)

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Dear Records-

Please file this email and its attachment as comments under PSE IRP Docket No. UE-160918.

I have previously filed the Lauckhart-Schiffman load flow study that demonstrates there is no need for Energize Eastside.

A. The best alternative for PSE to solve any possible future reliability problem on the east side is for PSE to run all of its Puget Sound Area generation. PSE did not consider this alternative in their Eastside Needs Assessment.

B. The next best alternative for PSE to solve any possible future reliability problem on the east side is for PSE to implement enhanced DSM programs including the possible installation of battery banks on the east side. These programs have been discussed in the Energize Eastside EIS. These programs have the added benefit of helping PSE meet its Total System Peak deficiency. PSE did not consider these alternatives in their Eastside Needs Assessment.

C. If any work **on the transmission grid** is needed to provide reliable service to the greater Bellevue area, then a clear alternative that should be studied is looping the Seattle City Light line through Lakeside substation. PSE has rejected this alternative because they claim SCL will not allow them to do that. But PSE never made a formal request to have SCL loop their line through Lakeside. If PSE would make that formal request, SCL is required under FERC Order 890 to respond in accordance with the FERC ProForma Open Access Transmission Tariff (OATT). See Attachment to this email. Only when PSE gets that response can they determine if the SCL line option is the best alternative for providing reliable service to the east side. PSE did not properly consider this alternative in their Eastside Needs Assessment.

D. Further, PSE should look at the alternative of building a 230/115 KV transformer at Lake Tradition. The plan to install a new 230/115 KV transformer at Lake Tradition has been on Puget's list for several years. PSE did not consider this alternative in their Eastside Needs Assessment.

E. There is another alternative to Energize Eastside that many utilities are using today. They are building small peaker plants in the vicinity of power constrained areas. This is a particularly good option if the constraint would be expected to come in to play only very rarely as is the case in the greater Bellevue area. That constraint only comes in to play when the temperature reaches 23 degrees or below during peak load hours and when at the same time two major 230/115 KV transformers on the east side fail. The small peaker plant is low cost and takes little space and likely could be located at the Lakeside substation. It would almost never run and if needed would run for only a short period of time. This alternative has the added benefit helping PSE meets its Total System Peak deficiency. PSE did not consider this alternative in their Eastside Needs Assessment.

In their draft IRP report coming out in a few months, PSE needs to describe these alternatives and why they are not being analyzed in the IRP as alternatives to Energize Eastside.

Rich Lauckhart  
Energy Consultant  
Davis, California

On behalf of a large number of citizens that are concerned about transmission matters in the greater Bellevue area.

## **Supporting Attachment No. 11**

To Comments made by Richard Lauckhart dated December 11, 2017

Comments demonstrating that the Seattle City Light line is a legitimate and better alternative to EE if there is a need and PSE chooses to use the FERC Open Access Transmission Tariff (OATT) rules available to them in order to enable this option to happen

May 11, 2017

Heidi Bedwell  
City of Bellevue Development Services Department  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Comment for Energize Eastside Phase 2 Draft EIS

Dear Ms. Bedwell:

I am writing to submit comment on the Energize Eastside Phase 2 Draft EIS.

**This comment relates to pages 2-52 of the Phase 2 Draft EIS. In particular section 2.2.1 "Seattle City Light Transmission Line" option.**

In order to understand how this option works, one needs to be familiar with FERC's ProForma Open Access Transmission Tariff (OATT). The FERC ProForma Open Access Transmission Tariff can be found at:

<https://www.ferc.gov/industries/electric/indus-act/oatt-reform/order-890-B/pro-forma-open-access.pdf>

Section 6 of the OATT discusses "Reciprocity". If SCL uses the lines of one or more FERC directly regulated utilities, then SCL will have agreed to these terms when they use those lines. Meaning under reciprocity, SCL agrees to also deal with requests for use of their transmission grid under the FERC OATT approach.

Other sections of interest to this SCL Transmission Line option are:

Section 15. Service Availability

Section 16. Transmission Customer Responsibility

Section 17. Procedures for arranging for Firm Point to Point transmission service

*[This section is particularly relevant to how PSE needs to ask SCL for use of its line to serve a new 230/115 KV transformer at Lakeside. **There is a requirement to make a formal application in the format that is described in the OATT. PSE has never made such an application. An informal request does not meet the required format for making a request to use the SCL line. PSE needs to make this formal request to SCL.***

Section 19. Additional studies procedures for Firm Transmission

With an understanding of how FERC's OATT works, it is clear that just about every sentence in the discussion of the SCL option is incorrect, meaning these sentences are not consistent with the OATT.

First sentence:

*"SCL has indicated to the City of Bellevue that they expect to need the corridor for their own purposes and are not interested in sharing the corridor with PSE (SCL, 2014)."*

The EIS staff should already be aware that FERC does not allow a utility like SCL to "hoard" its transmission capability. Further, the FERC OATT requires a utility like SCL to increase the rating of its infrastructure (with needed construction) if that is what it takes to honor a request for transmission and the requesting utility agrees to pay what FERC requires them to pay. No one has performed a System Impact Study (as required by the OATT) to see what it would take to honor a PSE request to use the SCL line to serve a new 230/115 KV transformer at Lakeside.

Second sentence:

*"The existing SCL line would have to be rebuilt to provide a feasible solution for the Energize Eastside project, because the current rating of the SCL line is insufficient to meet PSE's needs (Strauch, personal communication, 2015)."*

If it can be shown that the existing SCL line would need to be rebuilt to provide a feasible solution for the Energize Eastside project, then that is what the FERC OATT would require be done as long as PSE agrees to pay what FERC would require them to pay for that construction. Until a study is done, one cannot tell for sure what the rebuild cost would be. But it certainly would be less than the cost of Energize Eastside. Further, it should be clear that the request to use the SCL line is only for purposes of serving a new 230/115 KV transformer at Lakeside. The study to determine what this cost must not include a requirement to deliver 1,500 MW to Canada unless BPA makes that request and BPA would pay the bulk of the needed cost if the SCL line is also being used to increase the ability of BPA to deliver power to Canada.

Third Sentence:

*"PSE has estimated that rebuilding the SCL line would provide sufficient capacity for a period of less than 10 years, which does not comply with PSE's electrical criteria (as described in Section 2.2.1 of the Phase 1 Draft EIS) to meet performance criteria for 10 years or more after construction."*

Under the FERC OATT rules that SCL needs to comply with, SCL does not get to stop serving Lakeside after ten years even if SCL has a legitimate need for more use of its SCL line at that time. The FERC OATT has clear rules on how a utility like PSE can assure its transmission service from SCL can be retained even after SCL decides it needs the line for its own use. The FERC OATT protects a utility like PSE from SCL stopping to provide them transmission service.

Fourth Sentence:

*"Neither the City nor PSE can compel SCL to allow the use of this corridor; therefore, this option is not feasible and was not carried forward."*

This statement is wrong. PSE can compel SCL to use its line to serve a new 230/115 KV transformer by making a FERC Order 888 request (under the FERC OATT) for such transmission service. If SCL refuses, FERC will compel them to do so. FERC uses its "reciprocity" ruling to compel SCL. If SCL refuses, FERC will refuse to let SCL use any transmission lines that are under direct FERC jurisdiction. SCL could not meaningfully its service obligations to its own customers without using the transmission lines of FERC directly jurisdictional utilities.

Fifth Sentence:

"Even if compelled use of the corridor were allowed, the negotiations would likely prove lengthy, and would likely preclude completion of the project within the required timeline to meet project objectives."

The FERC OATT has tight timelines for dealing with requests for transmission service. FERC intentionally put in these tight timelines to prohibit a utility like SCL from denying service by delaying service. Further, PSE currently is not saying when it thinks it needs a new 230/115 KV transformer to be in service at Lakeside. Any needed construction on the existing SCL line will take considerably less time than permitting and building EE. Further, according to the only reasonable load flow study done regarding serving the east side (the Lauckhart-Schiffman Load Flow study), there is plenty of time before any new 230/115 KV transformer is needed at Lakeside.

Thank you for the opportunity to clarify how this SCL Transmission Line option would work.

Sincerely,

A handwritten signature in cursive script that reads "Richard Lauckhart".

Richard Lauckhart  
Energy Consultant  
Davis, California  
530-759-9390  
lauckjr@hotmail.com

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:24 AM  
**To:** Bedwell, Heidi  
**Subject:** Re: Lauckhart Comments on PSE Application...Supporting Attachment No. 1  
**Attachments:** Supporting Attachment 1.pdf

Ms Bedwell-

First supporting attachment re email below.

Richard Lauckhart

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Monday, December 11, 2017 8:19 AM  
**To:** hbedwell@bellevuewa.gov  
**Subject:** Lauckhart Comments on PSE Application for a CUP re Energize Eastside (File # 17-120556-LB)

Ms Bedwell-

You have advised me that Individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) to be a party of record for the CUP/CALUP applications.

By this email I am formally submitting my written comments. See attached. Note that my comments also refer to 17 Supporting Attachments. I will be submitting those 17 attachments in separate emails that refer to these comments because of the size limitation on email with attachments.

Please include the attached email and the related 17 Supporting Attachments (coming in separate emails) in the record for this CUP proceeding.

My names is: Richard Lauckhart  
My address is: 44475 Clubhouse Drive, Davis, California 95618  
My email address is: lauckjr@hotmail.com

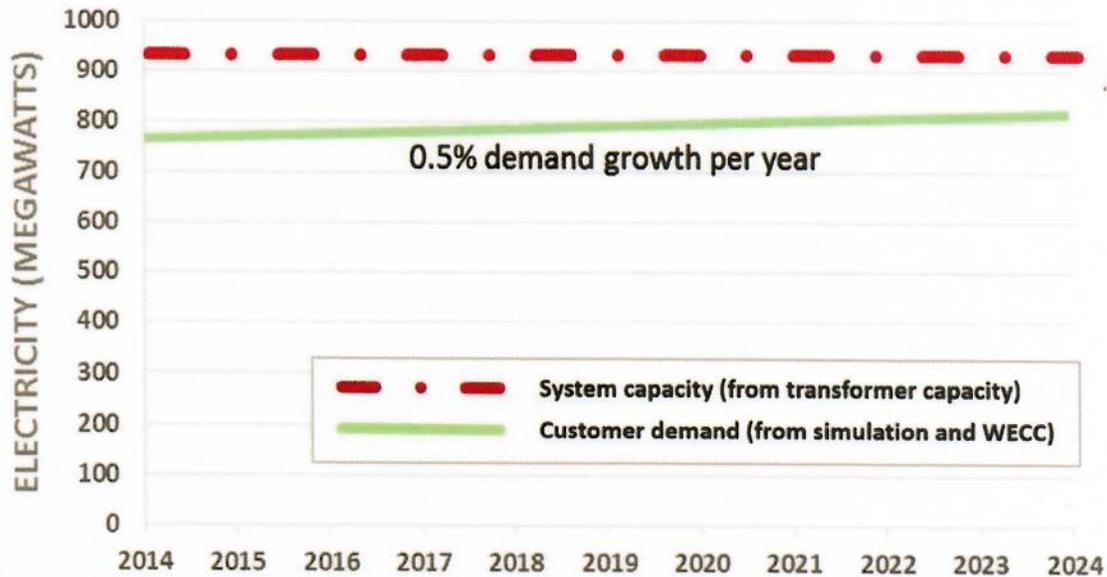
Richard Lauckhart  
Energy Consultant  
Commenting on behalf of PSE home owners who live on the East Side  
Former VP at Puget

## **Supporting Attachment No. 1**

To Comments made by Richard Lauckhart dated December 11, 2017

Lauckhart\_Schiffman Load Flow study showing EE is not needed

## LAUCKHART-SCHIFFMAN DEMAND FORECAST



# Load Flow modeling

## for "Energize Eastside"

Richard Lauckhart

Roger Schiffman

February 18, 2016

# Executive Summary

In November 2015, the citizen group CENSE asked Richard Lauckhart and Roger Schiffman to study the scenario that motivates Puget Sound Energy's transmission project known as "Energize Eastside." We (Lauckhart and Schiffman) are nationally recognized power and transmission planners with specific knowledge of the Northwest power grid.

It is standard industry practice to use a "load flow model" to determine the need for a transmission project like Energize Eastside. In order to assess the reliability of the grid, analysts use specialized computer software to simulate failure of one or two major components while serving peak load conditions. For Energize Eastside, PSE simulates the failure of two major transformers during a peak winter usage scenario (temperature below 23° F and peak hours between 7-10 AM and 5-8 PM).

We ran our own load flow simulations based on data that PSE provided to the Western Electricity Coordinating Council (WECC). We used a "Base Case" for winter peak load projected for 2017-2018. PSE confirms this is the same data used as the basis for the company's "Eastside Needs Assessment."

Our findings differ from PSE's as follows:

1. PSE modified the Base Case to increase transmission of electricity to Canada from 500 MW to 1,500 MW. This level of energy transfer occurring simultaneously with winter peak loads creates instability in the regional grid. Transmission lines connecting the Puget Sound area to sources in central Washington do not have enough capacity to maintain this level of demand.
2. PSE assumed that six local generation plants were out of service, adding 1,400 MW of demand for transmission. This assumption also causes problems for the regional grid.
3. Even if the regional grid could sustain this level of demand, it is unlikely that regional grid coordinators would continue to deliver 1,500 MW to Canada while emergency conditions were occurring on the Eastside.
4. We found that the WECC Base Case contains a default assumption that PSE may not have corrected. The ratings for critical transformers are based on "summer normal" conditions, but the simulation should use significantly higher "winter emergency" ratings. The default value could cause PSE to underestimate System Capacity and overstate urgency to build the project.
5. The Base Case shows a demand growth rate of 0.5% per year for the Eastside. This is much lower than the 2.4% growth rate that PSE cites as motivation for Energize Eastside.

**Our study finds critical transformers operating at only 85% of their winter emergency rating, providing enough capacity margin to serve growth on the Eastside for 20 to 40 years.**

# Qualifications

**Richard Lauckhart** served as a high level decision maker at Puget Sound Power & Light (the predecessor of Puget Sound Energy). His employment with the company spanned 22 years as a financial and transmission planner as well as power planning. He served as the company's Vice President of Power Planning for four years.

Richard took a voluntary leave package when Puget Power merged with Washington Energy Company in 1997. He provided additional contract services to PSE for more than a year following the merger. After leaving PSE, Richard worked as an energy consultant, providing extensive testimony on transmission system load flow modeling before the California Public Utility Commission.

**Roger Schiffman** has 23 years of energy industry experience covering utility resource planning, electricity market evaluation, market assessment and simulation modeling, regulatory policy development, economic and financial analysis, and contract evaluation. Roger has led a large number of consulting engagements for many clients. He has extensive knowledge of industry standard modeling software used for power market analysis and transmission planning.

We are well acquainted with the physical layout and function of the Northwest power grid and the tools used to analyze its performance. Our resumes can be found in Appendix H.

Richard has provided pro bono consultation to CENSE since April 2015. He has received no financial compensation other than reimbursement of travel expenses. Roger had no relationship with CENSE prior to this report.

# Methodology

The power grid is a complex interconnected system with behaviors that cannot be easily understood without computer modeling software. We acquired a license to run the industry standard simulation software known as “GE PSLF”<sup>1</sup> to perform our studies.

The PSLF software uses a database that is supplied by the operator. We had hoped to use the same database that PSE used in its studies, but PSE refused to share it after months of negotiations. Instead, we received clearance from the Federal Energy Regulatory Commission (FERC) to access the database PSE submitted to the Western Electricity Coordinating Council (WECC). FERC determined that we presented no security threat and had a legitimate need to access the database (see FERC’s letter in Appendix A).

We used the WECC Base Case for the winter of 2017–18, which PSE confirms is the database the company used for that time period. We and PSE have made subsequent changes to the Base Case model in order to incorporate various assumptions. We don’t know exactly what changes PSE made to the database, but we will be explicit about the changes we made.

## **N-0 base scenario**

To ensure that everything was set up correctly, we ran a simulation using the unmodified Base Case and checked to see if the results aligned with those reported by WECC. This is referred to as an “N-0” scenario, meaning that zero major components of the grid are offline and the system is operating normally. The outputs of this simulation matched reported results.

The WECC Base Case assumes that the Energize Eastside project has been built. In order to determine the need for the project, we needed to study the performance of the grid without it. We reset the transmission configuration using parameters from an earlier WECC case that did not include the project.

## **N-1-1 contingency scenario**

An “N-1-1” scenario models what would happen if two major grid components fail in quick succession. Utilities are generally required

<sup>1</sup> <http://www.geenergyconsulting.com/pslf-re-envisioned>

to serve electricity without overloads or outages in this scenario to meet federal reliability standards.

PSE determined that the two most critical parts of the Eastside grid are two large transformers that convert electricity at 230,000 volts to 115,000 volts, the voltage used by all existing transmission lines within the Eastside. To simulate the N-1-1 scenario, the Base Case is modified to remove these two transformers from service.

PSE apparently made two additional modifications to the WECC Base Case. First, the amount of electricity flowing to Canada was increased from 500 MW to 1,500 MW. Next, the company reduced the amount of power being produced by local generation plants from 1,654 MW to 259 MW. The rationale behind these modifications isn't obvious, and we were concerned how the regional grid (not just the Eastside) would perform with these assumptions in place.

To our surprise, simply increasing the flow to Canada to 1,500 MW while also serving peak winter power demand in the Puget Sound region was enough to create problems for the regional grid. The simulation software could not resolve these problems (Appendix E describes the problems in greater detail). While it's possible that PSE and Utility System Efficiencies found ways to work around these challenges by making additional changes to the Base Case, we do not know what these changes were. We are confident that prudent grid operators would reduce flows to Canada if an N-1-1 contingency occurs on the Eastside during heavy winter consumption. PSE would turn on every local generation plant. These responses resolve the problems. This is the more realistic scenario we modeled in our N-1-1 simulation.

The WECC Base Case uses default values for transformer capacity ratings that correspond to a "summer normal" scenario. The summer rating is reduced in order to protect transformers from overheating during hot summer weather. The "winter emergency" rating would be consistent with best engineering practice for equipment outages during very cold conditions (less than 23° F) that produce peak winter demand. We used this higher rating in our simulation.

# Results

## N-0 results

To compare the N-1-1 results with normal operation of the grid serving peak winter demand, we ran an N-0 study using the WECC Base Case for winter 2017-18 with the following modifications:

1. Energize Eastside transmission lines are reverted to present capacity.
2. Flow to Canada is reduced from 500 MW to 0 MW.
3. Transformers run at “winter normal” capacity.

Figure 1 shows load as a percentage of “winter normal” capacity on each of the four transformers.

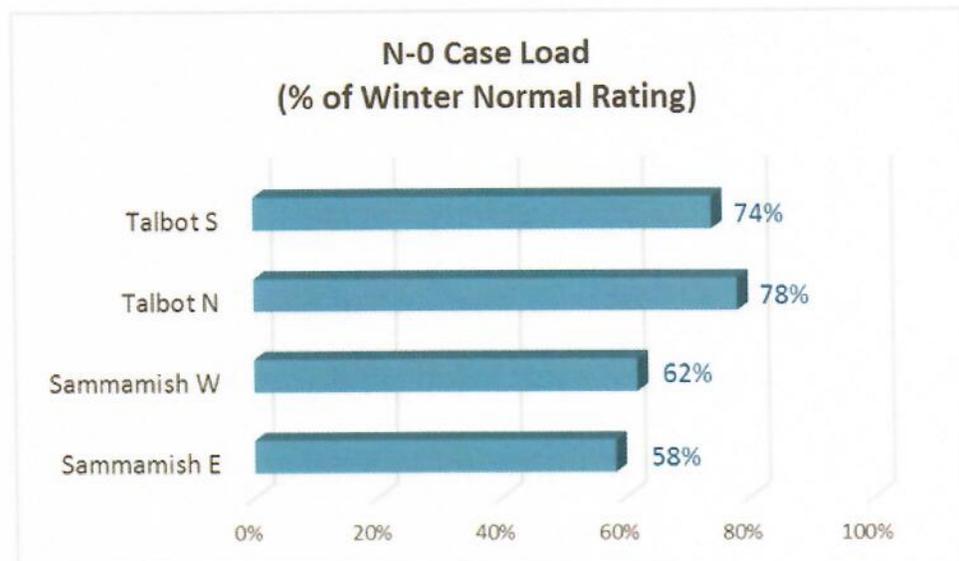


Figure 1: With all transformers in service, winter peak load causes no overloads.

### N-1-1 results

The N-1-1 results are based on the WECC Base Case for winter 2017-18 with the following modifications:

1. Two transformers are out of service.
2. Energize Eastside transmission lines are reverted to present capacity.
3. Flow to Canada is reduced from 500 MW to 0 MW.
4. Transformers run at “winter emergency” capacity.

Figure 2 shows that the remaining two transformers, Talbot N and Sammamish W, remain within “winter emergency” capacity ratings.

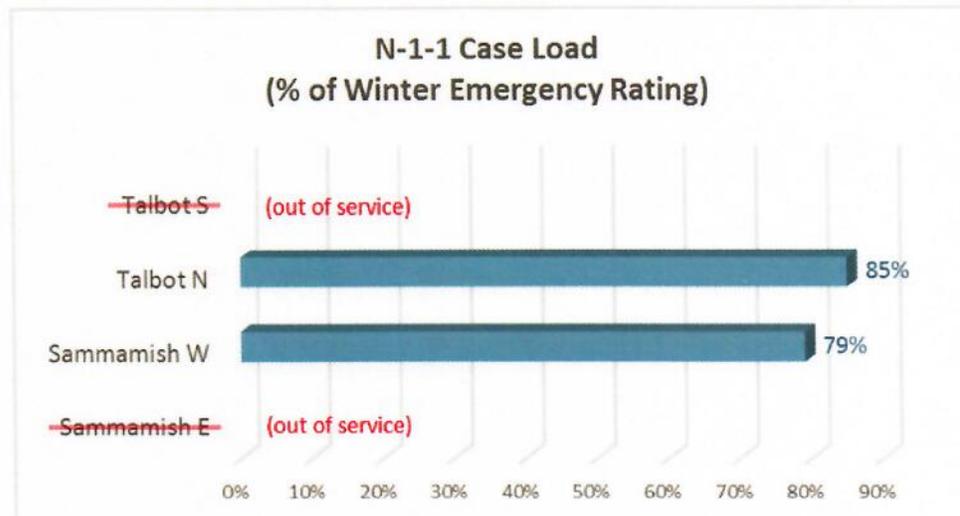


Figure 2: Loads on two remaining transformers are in a safe range.

# Analysis

We carefully analyzed the results of the N-1-1 simulation to get a broader view of how the grid is behaving in this scenario. Electricity is served by a combination of high-voltage transformers (transforming 230,000 volts to 115,000 volts) and low-voltage transformers (115,000 volts to 12,500 volts).

When we simulated failure of two high-voltage transformers located at Sammamish and Talbot Hill, as PSE did, we discovered that some of the load is redistributed to other high-voltage transformers in the Puget Sound area (see Figure 3). This is a natural adaptation of the networked grid that occurs without active management by PSE or other utilities. The regional grid has enough redundant capacity to balance the load without causing overloads on any transformer or transmission line in the region.

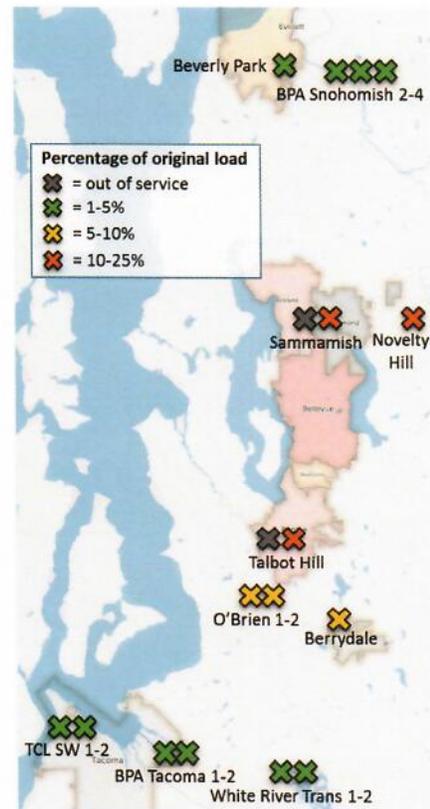


Figure 3: Load is distributed among other transformers after two transformers fail.

We conclude that the grid is capable of meeting demand in emergency circumstances in the winter of 2017–18. How soon after that will system capacity become strained?

Concerns about future capacity are illustrated in Figure 5, PSE’s demand forecast graph.<sup>2</sup> This graph raises several questions. For example, it’s not clear how PSE determined the “System capacity range” of approximately 700 MW. If this value is derived from the transformer capacities listed in the WECC Base Case, these capacities are set to default values corresponding to “summer normal” conditions.

PSE’s graph shows Customer Demand growing at an average rate of 2.7% per year. However, data submitted by PSE to WECC shows a growth rate of only 0.5% per year. An explanation of this discrepancy is necessary to understand this graph.

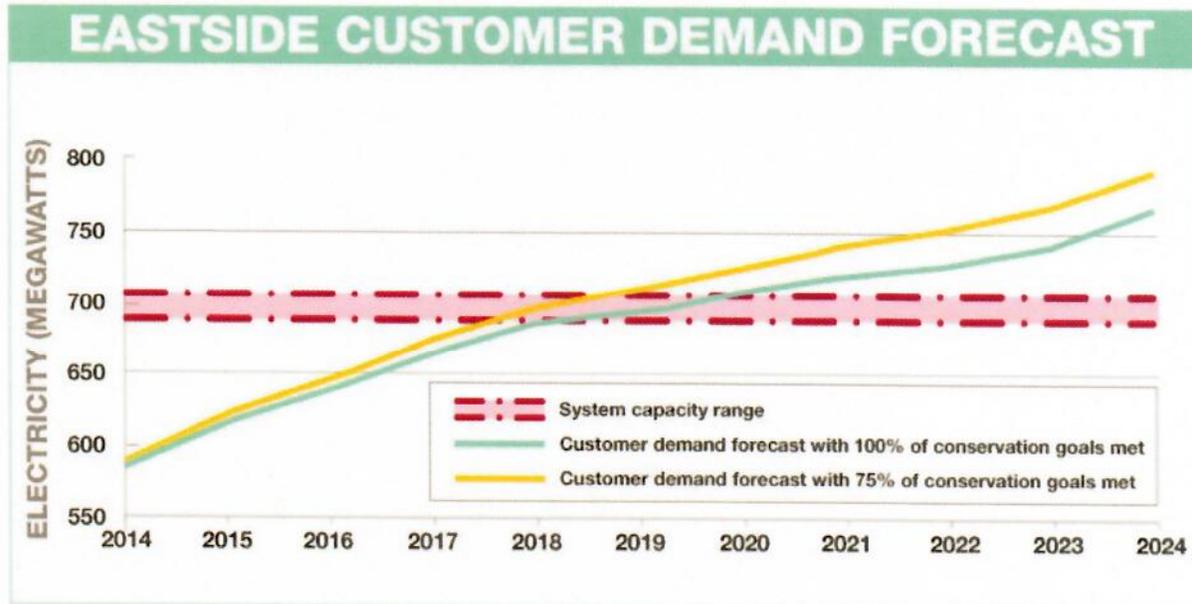


Figure 4: PSE’s graph shows customer demand exceeding system capacity in 2018.<sup>2</sup>

<sup>2</sup><http://www.energizeeastside.com/need>

Although we don't have enough information to create a graph suitable for long-term planning, we feel Figure 5 is a better approximation of system capacity and demand growth on the Eastside.

The "System capacity" is based on "winter emergency" transformer ratings, which are more appropriate than summer ratings for this scenario. The higher ratings raise the overall capacity to approximately 930 MW.

The "Customer demand" line shown in Figure 5 is based on loads reported in the load flow simulation for the two remaining Eastside transformers. The 2014 value is higher than in PSE's graph, because these transformers serve loads outside the Eastside area. The growth rate matches the 0.5% rate observed in WECC Base Cases.

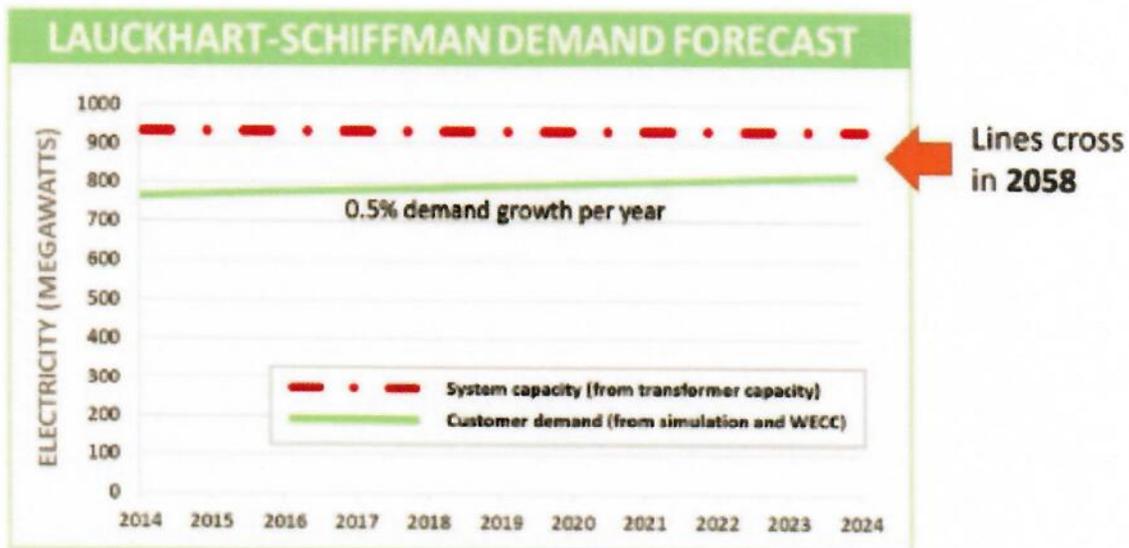


Figure 5: Alternative Demand Forecast shows slower demand growth and higher system capacity (based on "winter emergency" transformer ratings).

# Comparison with other studies

The conclusions of the Lauckhart–Schiffman study differ from previous studies. We stand by our conclusions and will share our models and results with anyone who has clearance from FERC.

Here we review the other studies and explain why their conclusions might differ from ours.

## **PSE/Quanta**

Two different load flow simulations were performed by PSE and Quanta, a consultant employed by PSE. We have the following concerns with both studies:

1. An unrealistic level of electricity is transmitted to Canada.
2. Nearly all of the local generation plants are turned off.
3. The appropriate seasonal ratings for the critical transformers were not used.
4. It's not clear how the customer demand forecast was developed, but there is an unexplained discrepancy between the forecast used for Energize Eastside (2.4% annual growth) and the forecast reported to WECC (0.5% annual growth).

The first two assumptions cause regional reliability problems for the WECC Base Case that must have required additional adjustments by PSE/Quanta. We don't know what those adjustments were.

## **Utility System Efficiencies**

The City of Bellevue hired an independent analyst, Utility System Efficiencies (USE), to validate the need for Energize Eastside. USE ran one load flow simulation that stopped electricity flow to Canada. According to USE, 4 of the 5 overloads described in the PSE/Quanta studies were eliminated, and the remaining overload was minor.

Our load flow simulation studied the same scenario (N–1–1 contingency with no flow to Canada and local generators running), but we did not find any overloads. We believe three assumptions explain the different outcomes:

1. USE does not specify what level of generation was assumed for local generation plants. In verbal testimony before the Bellevue

City Council, USE consultants said that they did not assume all of the capability of local generation was operating. Our study assumes these plants will run at their normal capacity.

2. USE says emergency ratings were used for the critical transformers, but it isn't clear if USE used "winter emergency" ratings. Our study assumes winter emergency ratings.
3. USE does not independently evaluate the customer demand forecast (2.4% annual growth is assumed). Our study assumes the load growth forecast that PSE provided to WECC.

We believe our assumptions more accurately reflect the actual conditions that would occur in this scenario.

### **Stantec Consulting Services**

In July 2015, the independent consulting firm Stantec was asked to review the studies done by PSE and USE. Stantec issued its professional opinion without performing any independent analysis or load flow simulations. Stantec says PSE's methodology was "thorough" and "industry standard." However, Stantec does not address the shortcomings we have identified with previous studies.

# Appendix A

## Clearance from FERC

Federal Energy Regulatory Commission  
Washington, DC 20426

SEP 01 2015

Letter of Release,  
Re: CEII No. CE15-130

**VIA CERTIFIED MAIL**

Richard Lauckhart



Dear Mr. Lauckhart:

This is in response to the July 15, 2015 request you submitted under the Federal Energy Regulatory Commission's (Commission or FERC) Critical Energy Infrastructure Information (CEII) regulations at 18 C.F.R. § 388.113(d)(4) (2015). Specifically, you requested a copy of the Puget Sound Energy, Inc. FERC Form No. 715, *Annual Transmission Planning and Evaluation Report*.

By letter dated August 21, 2015, the Commission issued a finding that you are a legitimate requester with a need for the information. In accordance with 18 C.F.R. § 388.112(e), the enclosed DVD contains the information requested and is being released to you subject to the non-disclosure agreement executed by you concerning this matter.

As provided by 18 C.F.R. § 388.113(d)(4)(iv) of the Commission's regulations, you may appeal this determination pursuant to 18 C.F.R. § 388.110. Any appeal from this determination must be filed within 45 days of the date of this letter. The appeal must be in writing, addressed to David L. Morenoff, General Counsel, Federal Energy Regulatory Commission, 888 First Street, NE, Washington, DC 20426. Please include a copy to Charles A. Beamon, Associate General Counsel, General and Administrative Law, at the same address.

Sincerely,

A handwritten signature in black ink that reads "Leonard M. Tao".

Leonard M. Tao  
Director  
Office of External Affairs

Enclosure

## Appendix B

# Choice of Base Case

To perform a load flow study, one needs a database reflecting the physical characteristics of the power grid. FERC has recognized that stakeholders need to have access to a Base Case that reflects the system. Each utility or a designated agent is required to file power flow base cases with FERC on an annual basis.<sup>3</sup> WECC acts as a designated agent for most of the utilities operating in the western U.S. In an email dated November 19, 2015 Jens Nedrud, the Senior Program Manager for Energize Eastside, confirmed that PSE uses Base Cases filed by WECC as its Base Cases.

For the purposes of this study, Lauckhart and Schiffman obtained the 2014 WECC Base Cases from FERC.<sup>4</sup> These included 13 Base Case runs, four of which are Heavy Winter scenarios. In order to evaluate the need for the EE project, the heavy winter 2017–18 Base Case was modified so that the Energize Eastside project was not included.<sup>5</sup>

We do not know if this modified 2017–18 Base Case is identical to the one used by PSE to justify the project, because PSE has refused to share their 2017–18 Base Cases for independent review. The WECC Base Case assumes 500 MW is transmitted to Canada. PSE apparently increased that amount to 1,500 MW. The WECC Base Case assumes local generation in the Puget Sound Area is running at normal capacity. PSE appears to have reduced those contributions by 1,395 MW. Our PSLF modeling suggests that PSE’s modifications are not feasible and grid operators would not allow these conditions to occur on a heavy winter load day.<sup>6</sup>

Load data from the WECC Heavy Winter Load 2017–18 Base Case is chosen as the basis for this study. This is the latest data provided by FERC/WECC for the winter of 2018. PSE was involved in the development of this Base Case along with other utilities including BPA and Seattle City Light (SCL). All utilities use these Base Cases to determine if the grid is capable of moving power from sources to loads. Further, it is the only data available in which there are identified loads on specific substations.

The loads on the main Eastside substations in the WECC Heavy Winter 2013–14 and 2017–18 Base Cases have been examined and analyzed. All of the Eastside substations were included:

Medina	Overlake	South Bellevue
Clyde Hill	Lochleven	Factoria
Bridle Trails	North Bellevue	College
Evergreen	Center	Phantom Lake
Ardmore	Midlakes	Eastgate
Kenilworth	Lake Hills	Somerset

The total load on these substations in the 2013–14 Base Case was 394.6 MW. The total load on these substations in the 2017–18 Base Case was 402.4 MW. This is a peak load growth of 2.0% over the 4 year period (an average increase of 0.5% per year). This is in line with predicted growth of energy and peak in King County.

PSE and USE appear to be extrapolating the higher growth rate of a few substations due to “block loads” and applying it uniformly to 600 MW of existing substation load. This simplification overestimates the overall growth rate. Furthermore, the total load on the substations listed above is only 400 MW. It is not clear how PSE arrived at a 600 MW load.

<sup>3</sup> <http://www.ferc.gov/docs-filing/forms/form-715/instructions.asp#General%20Instructions>

<sup>4</sup> On July 9, 2015 FERC provided Lauckhart the most recent WECC Base Cases that it had available to send to requesters. Those Base Cases were ones filed in 2014 by WECC.

<sup>5</sup> On Dec. 4, 2015 Lauckhart also received from FERC a copy of the 2015 WECC FERC Form 715 filing. In that filing there was no Base Case filed for the winter of 2018. However, there was a Base Case filed for the winter of 2020. A review of that 2020 Base Case showed very little growth on the Eastside from the 2018 Base Case. It also showed that the rest of the Northwest actually reduced their load forecast for the year 2020 over their forecast for 2018. In total, the loading on the eastside 230/115 KV transformers in the 2020 case were lower than the loading on the Eastside 230/115 KV transformers in the 2018 case. The trend is that the situation is not getting worse since the load forecasts for the northwest are dropping overall which also reduces loading on the Eastside 230/115 KV transformers.

<sup>6</sup> With no other changes to the WECC Base Case for the winter of 2018, increasing PNW to BC transfers to 1,500 causes the system to need to import more power across the Cascades from Central Washington. This causes the PSLF model run to fail to find a solution. When we say no solution, we mean the voltage in the Puget Sound region gets too low and the model cannot find a way to correct that.

## Appendix C

# Generation pattern used

PSE's gas-fired generation plants located in the Puget Sound area have a total rated capacity of 1,654 MW. How much of this capacity should be used to serve peak demand during a heavy winter load event? There are three choices:

1. The Eastside Needs Assessment prepared for PSE by Quanta assumed generation of only 259 MW, without explaining why such a low level was used.
2. The load flow study performed by USE also ran the plants at a reduced rate, but the study did not specify the exact amount.
3. Three of the four WECC heavy winter Base Cases assume the plants are running at their rated capacity of 1,654 MW. One of the Base Cases turns off one plant for reasons that are not clear, resulting in a lower level of generation at 1,414 MW.

The 1,654 MW capacity used by WECC in 3 of its 4 heavy winter Base Cases is a prudent choice for several reasons. First, PSE built and/or acquired these plants for the explicit purpose of meeting its load obligations during cold winter events. Second, PSE has a well-documented shortfall of generation capacity to serve peak demand, and it will be less risky and less expensive to run these plants than to buy power on the spot market. Third, because these plants generate electricity at 115 kV, the strain on PSE's overloaded 230/115 kV transformers would be reduced by increasing the supply of 115 kV electricity.

## Appendix D

# Exports to Canada

PSE and USE assume that 1,500 MW of power must be delivered to Canada, even if PSE is experiencing failure of two critical system components (an N-1-1 contingency) during heavy winter load conditions (temperatures less than 23° F in the Puget Sound region).

The WECC Base Cases assume otherwise. In the WECC Base Case for heavy winter 2013–14, 500 MW of power is flowing south from Canada to the U.S. In the WECC Base Case for heavy winter 2017–18, with the Energize Eastside project in place, 500 MW of power is flowing north to Canada, not 1,500 MW.

PSE and USE imply that it is the Columbia River Treaty that provides a Firm Commitment to deliver 1,500 MW of power to Canada. It is clear from reading numerous Treaty documents (e.g. the original treaty, the amendment to the treaty in 1999, and related documents) that the Treaty itself imposes no obligation on the United States to deliver Treaty Power to Canada. To the contrary, Canada has stated they do not want the Treaty Power delivered to Canada. Instead, PowerEx takes delivery of Canada's share of Treaty Power at the point of generation in the U.S. and delivers it for sale to U.S. entities. Canada finds it preferable to receive money for their share of Treaty Power rather than having the power delivered to Canada.

The reasonable assumption for this study is that no power will flow from the U.S. to Canada during a major winter weather event and simultaneous facility outages in the Eastside.

# Appendix E

## Regional grid capacity limitations

Most of the electrical generation facilities that serve the Puget Sound region are located east of the Cascade Mountains. The electricity they produce is transmitted to customers in the Puget Sound area through eleven major transmission lines known collectively as the “West of Cascades – North” (WOCN) transmission path.

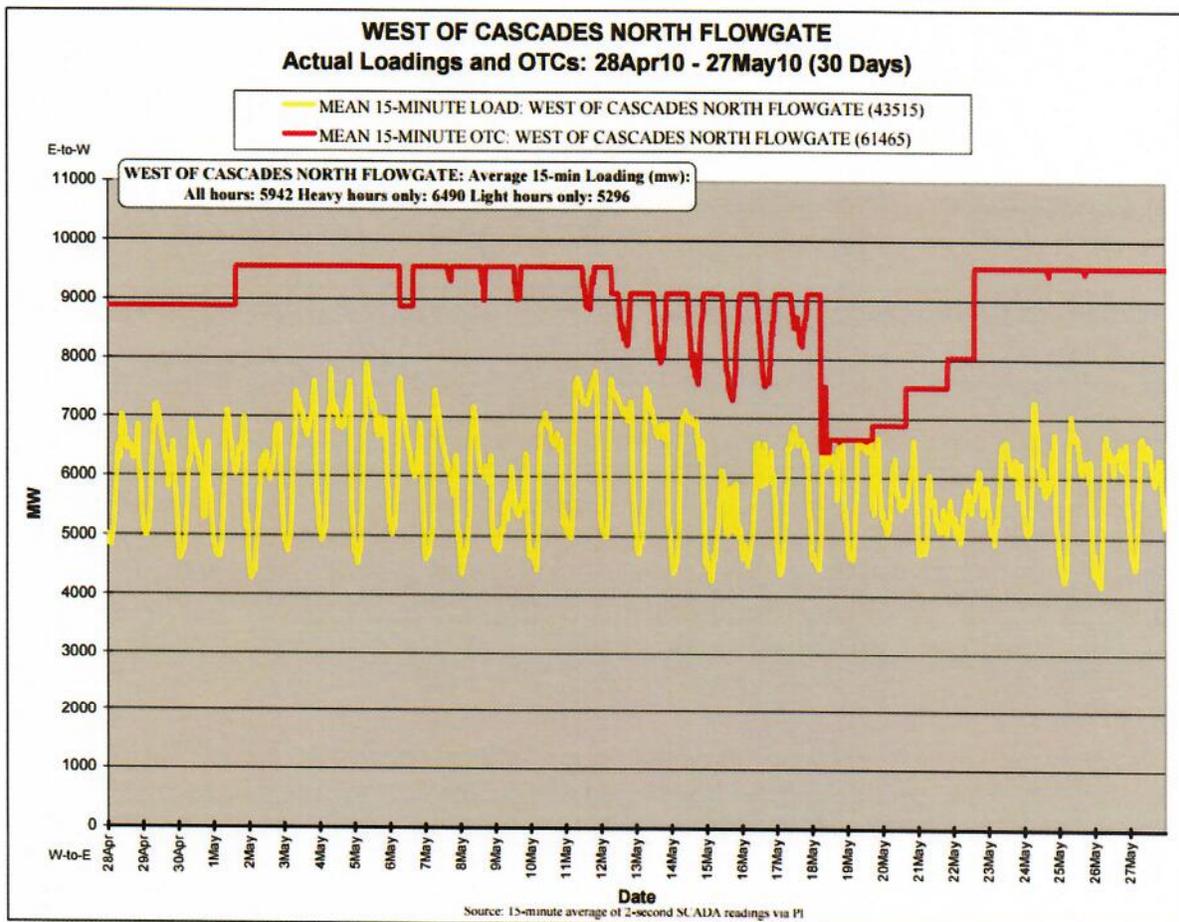


Figure 6: Chart from BPA shows load (in yellow) and maximum capacity (in red) for the WOCN path.

The exact transmission capacity of the WOCN path is confidential information which cannot be discussed in detail here. However, there is a report available on the web from the Bonneville Power Administration that discusses a problem that occurred on the WOCN path in May 2010.<sup>7</sup> On page 31, the report includes a chart showing loads and capacities

of the WOCN path over a 30-day period. The load (shown in yellow) varies from 5000–7000 MW and the path capacity (in red) varies from 7000–9000 MW.

During a heavy winter usage scenario, the loads are likely to be higher than during relatively mild weather conditions in May. PSE's assumptions for Energize Eastside would further increase the load. To deliver 1,500 MW to Canada, loads on the WOCN path would need to increase by approximately 1,000 MW. To make up for the loss of electricity that could have been generated by six local generation plants, an additional 1,400 MW must be transmitted on the WOCN path. In total, loads would increase by approximately 2,400 MW.

If the increased load exceeds the capacity of the WOCN path, grid operators and utilities would have to make adjustments like they did in May 2010. Some of these steps and consequences are described on page 40 of the BPA report:

“Many customers (e.g., TransAlta, Calpine, PSE, PGE) were not able to use low cost power purchases, and instead had to operate higher cost thermal projects that otherwise were idled or were out or planned for maintenance. Although there were multiple complaints regarding the ability to serve load, the basis for the complaints appeared to be economic or financial impacts.”

We feel that WOCN path capacity limits explain why the simulation software could not find a way to maintain voltage levels in the Eastside given PSE's assumptions. We conclude that it is not reasonable to build local infrastructure to support these conditions if regional infrastructure cannot reliably serve the implied loads.

<sup>7</sup> <http://pnucc.org/sites/default/files/BPAWOCNLessonsLearned.pdf>

# Appendix F

## Equipment ratings

Ambient temperature affects the capacity of electrical transmission facilities. Colder temperatures help avoid overheating. For this reason, it is industry standard practice to provide different ratings for summer and winter seasons.

It is also industry standard practice to allow higher loading of equipment, including transformers, during emergency events due to the fact that emergencies do not last long. Utilities can take advantage of the fact that transformers can safely handle brief over-peak conditions to reduce installation costs and maintain system reliability.

The WECC Data Preparation Manual requires transmission owners to provide the following ratings for its transformers:

- Summer Normal Rating
- Summer Emergency Rating
- Winter Normal Rating
- Winter Emergency Rating

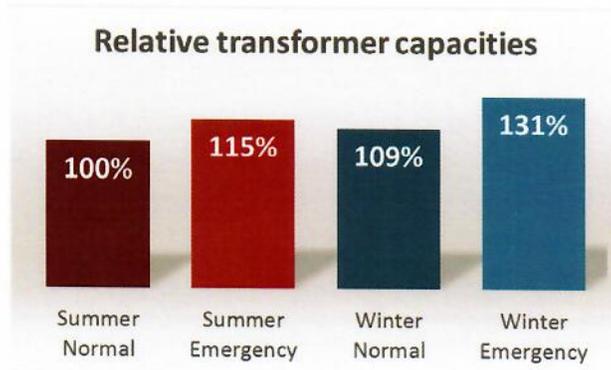


Figure 7: Ratings for different scenarios, normalized to Summer Normal rating.

PSE has indicated that the rating on the Sammamish and Talbot Hill transformers are approximately 352 MVA (Mega-volt amperes). According to the data that PSE provided to WECC, this is the Summer Normal Rating of these transformers. PSE has advised WECC that (a) its Winter Normal ratings are about 9% higher than Summer Normal, and (b) Winter Emergency Ratings are about 21% higher than Winter Normal Ratings.

When running the PSLF model, the run parameters must be set to point to the correct rating that has been provided in the data base. <sup>8</sup>

In the N-0 analysis, our load flow studies used the winter normal rating which is 9% higher than the 352 MVA summer normal rating.

In the N-1-1 analysis, our load flow studies used the winter emergency rating that is 21% higher than the winter normal rating.

## Appendix G

# Summer load scenario

Most of the load flow modeling done by PSE and USE to justify Energize Eastside has been focused on a winter peak load scenario. Recently, PSE has mentioned reliability concerns in the summer to provide additional motivation to build Energize Eastside. So far, PSE has refused to provide input data and results for both winter and summer scenarios.

We briefly reviewed the WECC Base Case for heavy summer demand in 2019. The peak load on Eastside substations is 281 MW in this scenario. This is 30% lower than the total load for heavy winter demand in 2017–18 (402 MW). The drop in transformer ratings due to summer heat is only 9%, so this scenario should be significantly less stressful on PSE's infrastructure than the winter scenario. Rapid growth in air conditioning is a concern, but if there is a summer need, then rooftop solar in Bellevue and other cities will be helpful and should be encouraged. Further study is warranted.

# Appendix H

## Resumes

## **J. Richard Lauckhart Energy Consulting**

J. Richard Lauckhart has 40 years of experience in power supply planning, electricity price forecasting and asset valuation. He began his career as a distribution engineer with Pacific Gas & Electric Co., and held various positions at Puget Sound Power & Light Co. (now Puget Sound Energy) in power supply planning, culminating as vice president of power planning.

For the last 12 years Mr. Lauckhart has performed consulting assignments related to power market analyses, price forecasting services, asset market valuation, integrated resource planning, transmission line congestion analysis, and management of strategic consulting engagements for clients in North America, including investor-owned and municipal utilities, independent power producers, and lenders.

Mr. Lauckhart received a bachelor of science degree in electrical engineering from Washington State University in 1971 and a masters degree in business administration from the University of Washington in 1975

### **Representative Project Experience**

#### ***Black & Veatch September 2008 to October 2011 Managing Director***

Mr. Lauckhart oversees wholesale electricity price forecasting, project revenue analysis, consults regarding wind integration matters electric interconnection and transmission arrangements for new power projects, and other related matters in the electric power industry. In addition, he heads Black & Veatch's WECC regional power markets analysis team.

#### ***WECC Power Market Analysis and Transmission Analysis, Henwood/Global Energy Decisions/Ventyx 2000 - 2008 Senior Executive***

Mr. Lauckhart oversaw wholesale electricity price forecasting, project revenue analysis, consulted regarding electric interconnection and transmission arrangements for new power projects, and other related matters in the electric power industry. In addition, he headed Global Energy's WECC regional power markets analysis team.

#### ***Lauckhart Consulting, Inc. 1996 - 2000 President***

Primary client - Puget Sound Energy (formerly Puget Sound Power & Light Company): Involved in power contract restructuring, market power analysis, FERC 888 transmission tariffs, and other matters. Testified at FERC regarding Puget's 888 tariff. Testified for Puget in June, 1999 arbitration with BPA regarding transmission capability on the Northern Intertie.

#### ***Northwest IPP***

Under retainer with IPP from July 1996 through December 31, 1999. Involved primarily in merchant power plant development activities including permitting activity, owner's engineer identification, environmental consultant identification, water supply

## **RICHARD LAUCKHART**

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arrangement, transmission interconnection and wheeling arrangements, gas pipeline arrangements, economic analysis, forward price forecasting, marketing, and related issues.

### ***Levitan & Associates (Boston)***

Participated in teams involved in electric system acquisition activities. Performed preliminary analysis for a major retail corporation regarding possible participation as an aggregator in the California deregulated electric market. Involved in the evolving discussions about deregulation in the state of Washington including participant in HB 2831 report and ESSB 6560 report.

Member of advisory task force for Northwest Power Planning Council study of generation reliability in the Pacific Northwest. Participating writer in a newsletter advocating electric deregulation in the state of Washington.

### ***Puget Sound Power & Light Company***

***1991 – 1996***

*Vice President, Power Planning*

Involved in all aspects of a \$700 million per year power supply for a hydro/thermal utility with a 4,600 MW peak and 2,200 aMW energy retail electric load. Included responsibility for a 22 person department involved in power scheduling (for both retail and wholesale power activity), power and transmission contract negotiation and administration, regulatory and NERC compliance, forward price forecasting, power cost accounting, and retail rate activity related to power costs. Activity included matters related to 650 MW of existing gas-fired, simple cycle combustion turbines. In addition, 660 MW of combined cycle cogeneration “qualifying facilities” were developed by others for Puget during this time frame. Detailed understandings of the projects were developed both for initial contractual needs and later for economic restructuring negotiations. Mr. Lauckhart was the primary person involved in developing Puget’s Open Access transmission tariff in accordance with FERC Order 888.

### ***Puget Sound Power & Light Company***

***1986 – 1991***

*Manager, Power Planning*

The company’s key person in developing (1) a WUTC approved competitive bidding process for administering PURPA obligations, and (2) a WUTC approved regulatory mechanism for recovery of power costs called the Periodic Rate Adjustment Mechanism (PRAM).

### ***Puget Sound Power & Light Company***

***1981 – 1986***

*Director, Power Planning*

The company’s key person in developing a power cost forecasting model that was customized to take into account the unique nature of the hydro generation system that exists in the Pacific Northwest.

### ***Puget Sound Power & Light Company***

***1979 – 1981***

*Manager, Corporate Planning*

Responsible for administering the corporate goals and objectives program.

### ***Puget Sound Power & Light Company***

### *1976 – 1979*

#### *Financial Planning*

Improved and ran a computerized corporate financial forecasting model for the company that was used by the CFO.

### *Puget Sound Power & Light Company*

#### *1974 – 1976*

#### *Transmission Planner*

Performed transmission engineering to assure a reliable transmission system.

### *Pacific Gas & Electric Company*

#### *1971 – 1974*

#### *Distribution Engineer*

Performed distribution engineering to assure a reliable distribution system.

### **Other Relevant Experience**

- Expert testimony for Montana Independent Renewable Generators related to avoided cost regulations and pricing filed February 2009 at the Montana PSC
- Expert Testimony for LS Power in the SDG&E Sunrise Proceeding regarding economics of in-area generation vs. the cost of transmission and imported power Spring 2007
- Expert Testimony for BC Hydro in the Long Term Resource Plan, February 2009 dealing with natural gas price forecasts and REC price forecasting
- Expert Testimony for John Deere Wind in a proceeding in Texas in November 2008 related to avoided costs and wind effective load carrying capability
- Expert Testimony for Two Dot Wind before the Montana commission regarding wind integration costs Spring 2008
- Expert Testimony in the BC Hydro Integrated Electricity Plan proceeding regarding WECC Power Markets. November 2006.
- Expert Testimony for Colstrip Energy Limited Partnership before Montana PUC regarding administration of QF contract prices. July 2006.
- Expert Testimony for Pacific Gas & Electric regarding current PURPA implementation in each of the 50 states. January 2006.
- Expert Testimony in CPUC proceeding regarding modeling procedures and methodologies to justify new transmission based on reduction of congestion costs (Transmission Economic Analysis Methodology – TEAM). Summer 2006.
- Expert Testimony for BC Hydro regarding the expected operation of the proposed Duke Point Power Project on Vancouver Island, January 2005
- Expert Testimony for PG&E regarding the cost alternative generation to the proposed replacement of steam generators for Diablo Canyon, Summer of 2004.
- Expert Testimony in an arbitration over a dispute about failure to deliver power under a Power Purchase Agreement, Fall 2004.
- Integrated Resource Plan Development. For a large investor-owned utility in the Pacific Northwest, Global Energy provided advanced analytics support for the development of a risk-adjusted integrated resource plan using RISKSYSM to provide a stochastic analysis of the real cost of alternative portfolios.
- Expert Testimony for SDG&E, Southern California Edison, and PG&E regarding IRPs, WECC markets and LOLP matters before the California PUC, 2003.

## **RICHARD LAUCKHART**

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- Miguel-Mission Transmission Market Analysis-San Diego Gas & Electric. San Diego Gas & Electric retained Global Energy to oversee an analysis of the economic benefits associated with building the Mission-Miguel transmission line and the Imperial Valley transformer. Global Energy performed an analysis of the economic benefits of the Mission-Miguel line, prepared a report, sponsored testimony at the CPUC, and testified at the CPUC regarding the report.
- Valley-Rainbow Transmission Market Analysis-San Diego Gas & Electric. San Diego Gas & Electric also engaged Global Energy to analyze the economic benefits associated with building the Valley-Rainbow transmission line and to respond to the CPUC scoping memo that “SDG&E should describe its assessment of how a 500 kV interconnect, like Valley-Rainbow, will impact electricity markets locally, regionally, and statewide.” Global Energy analyzed the economic benefits of the Valley-Rainbow line, prepared a report, sponsored testimony at the CPUC, and testified at the CPUC regarding the report.
- Damages Assessment Litigation Support. Global Energy was engaged by Stoel Rives to provide damages analysis, expert testimony and litigation support in for its client in a power contract damages lawsuit. Global Energy quantified the range of potential damages, assessed power market conditions at the time, and provided expert testimony to enable Stoel Rives’ client to prevail in a jury trial.
- Expert Testimony, Concerning the Economic Benefits Associated with Transmission Line Expansion. Testimony prepared on behalf of San Diego Gas & Electric Company, September 2001.
- Expert Testimony, Concerning market price forecast in support of Pacific Gas and Electric hydro divestiture case, December 2000.
- Expert Testimony, Prepared on behalf of AES Pacific regarding value of sale for Mohave Coal project to AES Pacific for Southern California Edison, December 2000.
- Expert Testimony, Prepared on behalf of a coalition of 12 entities regarding the impact of Direct Access of utility costs in California. June 2002.

Mr. Lauckhart was Puget’s primary witness on power supply matters in eight different proceedings before the Washington Utilities and Transportation Commission.

Mr. Lauckhart was Puget’s chief witness at FERC in hearings involving Puget’s Open Access Transmission Tariff and testified for Puget in BPA rate case and court proceedings.

# ROGER SCHIFFMAN

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## SUMMARY OF QUALIFICATIONS

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Mr. Schiffman has 23 years of energy industry experience covering utility resource planning, electricity market evaluation, market assessment and simulation modeling; regulatory policy development; economic and financial analysis, and contract evaluation. Mr. Schiffman has worked with public and private utility companies on resource planning decisions, power plant retirement decisions, avoided cost determinations, and on power supply procurement activity. Mr. Schiffman has worked extensively with electric utility staff, power plant developers, regulatory personnel, investment bankers and other industry participants in both consulting and regulatory environments. Mr. Schiffman possesses extensive financial analysis skills, supported by thorough knowledge of financial, economic and accounting principles. He has a strong technical understanding of the electric utility industry and excellent analytical problem-solving skills, including quantitative analysis and computer modeling techniques.

## EXPERIENCE

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*Principal, Black and Veatch Corporation, Inc., Sacramento, CA, March 2009 to October, 2015*

- Initiated Integrated Resource Plan for the Virgin Islands Water & Power Authority. This project is a multi-faceted IRP, where detailed planning and potential siting impacts must be considered in the overall planning, due to geographic and topology limitations on the islands. Mr. Schiffman directed the analysis and playing the lead analytic role in assessing resource needs. This included directing the data gathering efforts, taking technical lead in completing production cost and financial modeling, and managing Black & Veatch's team of technical experts. Mr. Schiffman also developed a stakeholder process and gave multiple presentations before stakeholder and customer groups.
- Completed nodal market simulation and congestion study for a concentrating solar plant in Northern Nevada. This engagement includes a review of transmission system impact studies, power flow data and development of a PROMOD nodal simulation database to assess congestion likelihood for the project.
- Completed economic assessment of a large pumped storage project in Southern California, including development of energy market arbitrage, capacity market and ancillary services market revenue forecasts. Developed pro forma financial statements examining economics of project under different ownership and off-take agreement structures.
- Completed Integrated Resource Plan for Azusa Light & Water, a municipal utility in southern California. This project involved using Black & Veatch's EMP database and price forecast, specifying thermal and renewable resource options, and completing detailed market simulation and financial modeling to determine a preferred power supply plan for Azusa. A key focus of the study is to identify resource options to replace output from the San Juan 3 coal plant, which is scheduled to retire.
- Completed Integrated Resource Plan for Pasadena Water & Power, a municipal utility in southern California. This project involved using Black & Veatch's EMP database and price forecast, specifying thermal and renewable resource options, and completing detailed market simulation and financial modeling to determine a preferred power supply plan for Pasadena. The project also included reflection of key stakeholder input, and testing stakeholder driven

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policy proposals for advancing renewable resource procurement beyond state-mandated RPS levels. A key focus of the study is to identify resource options to replace output from the Intermountain coal plant, which is scheduled to retire.

- Completed generation reliability study for the Brownsville Public Utility Board. This study included directing the completion of detailed reliability modeling using GE-MARS, and evaluating loss-of-load probabilities for BPUB based on its existing system and based on the addition of a 200 MW ownership share in the combined cycle power plant being developed in Brownsville by Tenaska. The study also included detailed pro forma modeling of partial ownership of the combined cycle plant, and a financial and risk assessment presented to BPUB's Board of Directors, and also used to address rating agency questions about credit impacts of the new power plant. On behalf of Southern California Edison, completed nodal power price forecast and assessment of high voltage transmission upgrades and additions in Southern California. This project included an assessment of congestion, locational marginal pricing, transmission system losses, and economic impacts of adding new transmission facilities in WECC, with particular focus on Southern California. PROMOD IV was used to complete the nodal market analysis, and PROMOD simulation results were translated into GE-PSLF for more detailed transmission system modeling of power flow cases under a variety of supply and demand conditions throughout the year.
- Completed four projects focused on nodal market modeling in California, Arizona and Southern Nevada. These studies were used to assess congestion risk faced by solar and wind generation projects at the sites where each is being developed. Completed PROMOD IV dispatch and nodal analyses for each project, and developed risk assessments for generation curtailment risk. Also developed analyses of transmission system congestion along delivery paths for each project, and on key economic transmission paths in Northern and Southern California, transmission import paths into Southern California, and transmission paths in Southern Nevada.
- Completed resource and power supply planning/procurement project for confidential SPP energy supplier. Completed a competitiveness assessment of major electricity supplier in Nebraska, examining cost structure, net resource position, generation asset characteristics, transmission access and delivery options, and overall competitive positioning of SPP, MISO and MRO entities that have potential to provide wholesale electricity service in Nebraska. Worked collaboratively with client and a wholesale customer task force
- Completed due diligence analysis of portfolio of power supply assets to support bid development. The generators being sold were located in SPP, WECC, and the Northeast. The WECC asset is a qualifying facility, which required detailed representation and modeling of the California PUC Short-Run Avoided Cost tariff and pricing formula. One of the SPP assets is also a qualifying facility, which required detailed analysis of the steam load and interaction between joint power and steam production. Completed modeling analysis and risk assessment of power supply agreements, developed revenue forecasts for each power plant, and completed merchant plant analysis of plant operations after PPA expiration.
- On behalf of a municipal utility client, developed database of renewable energy resource bids solicited through an RFP process, developed assessment of delivery terms and transmission tariffs associated with power delivery from distant resources, and completed bid screening analysis of 240 separate bids/pricing options.
- Completed PROMOD IV dispatch analysis and economic assessment of 6,000 MW portfolio of coal and natural gas-fueled resources operating in the Midwest ISO market region. Developed expected operations, cost, market sales and revenue forecasts for portfolio assets,

under several market scenarios. Prepared Independent Market Report for potential use in Offering Memorandum.

- Completed detailed review of California ISO ancillary services markets, and opportunity for renewable energy and energy storage markets to participate in those markets. Analysis included assessment of day-ahead, hour-ahead, and real-time market operation.
- Completed dispatch modeling and power supply planning study examining construction of a pumped storage hydro project in Hawaii. The evaluation included assessments of project revenue in energy, ancillary services, and capacity markets in Hawaii, expected dispatch and operation of the pumped storage project, and comparison of long-term power supply plans with and without addition of the pumped storage project.
- Completed deliverability and congestion analysis of wind energy resources being located in California. Developed nodal market simulations, and examined locational marginal price differences, congestion components, and transmission line loadings of facilities impacted by the wind assets being studied.
- Completed detailed financial and dispatch modeling (deterministic and stochastic) of energy storage project being developed in Southern California, to create dispatch profile and estimated long-term project value of the facility. The evaluation included assessments of project revenue in energy, ancillary services, and capacity markets in Southern California.
- Completed dispatch analysis and financial modeling of pumped storage hydro project in Colorado, for use in regulatory proceedings. The evaluation included assessments of project revenue in energy, ancillary services, and capacity markets in Colorado.
- Completed nodal power price forecast and assessment of high voltage transmission upgrades and additions in Southern California. This project included an assessment of congestion, locational marginal pricing, transmission system losses, and economic impacts of adding new transmission facilities in WECC, with particular focus on Southern California. PROMOD IV was used to complete the nodal market analysis, and PROMOD simulation results were translated into GE-PSLF for more detailed transmission system modeling of power flow cases under a variety of supply and demand conditions throughout the year.
- Completed PROMOD IV dispatch and economic analysis of Lodi Energy Center, with focus upon expected dispatch of the project, and its fit into the overall power supply portfolio of a Southern California Municipal Utility.
- Completed PROMOD IV dispatch analysis of a 100 MW biomass project in Florida, with focus upon expected dispatch and market revenue for the project in Florida wholesale power markets. Prepared Independent Market Report for use in financing construction of this project.
- Completed PROMOD IV market price forecasts and detailed analyses of power markets in all North American regions, including hourly energy price forecasts, annual capacity price forecasts, and detailed assessment of supply/demand conditions and generator dispatch. The assessments included forecasts of renewable energy development in each region/submarket, forecast greenhouse gas regulation, and economic assessment of fossil and renewable energy technologies.

*Vice President, Ventyx, Inc., Sacramento, CA, June 2007 to March 2009*

- Managed project and led analysis for consortium of upper Midwest utilities focused on developing plans for long-term transmission expansion to ensure reliability in the region and to accommodate economic transfer of large-scale wind-based electricity generation. This project examined congestion, reliability and economic benefits associated with large-scale wind generation expansion in the upper Midwest, and accompanying needs for transmission system expansion. Evaluation was completed on both nodal and zonal basis.
- Assisted investor-owned utility in the upper Midwest in completing an economic transmission planning study consistent with FERC requirements. Provided guidance to client in establishing study framework, and in completing detailed technical evaluation of transmission upgrade projects. Provided assistance with stakeholder group interactions and debriefing.
- Conducted study for Western Area Power Administration examining economic impacts of wind project integration from new wind projects located on Native American lands. Worked with multi-party stakeholder group in completing study. Specific focus was upon power system modeling and economic evaluation of long-term costs and benefits of wind energy integration into the WAPA system.
- Developed projections of expected dispatch, revenue, and operating costs for new combined-cycle power plant under development in Southern California. Prepared financial projections under merchant plant and other likely economic scenarios. Completed evaluation of tolling agreement terms and conditions.
- Assisted Southern California energy supplier in completing due diligence analysis for investment and development of 300-500 MW wind generation project located in Central/Southern California. Reviewed due diligence documents and completed economic evaluation of expected revenue, operating costs and investment cash flows for the project at a range of capacities varying from 100 MW to 500 MW.

*Director, Navigant Consulting, Inc., Sacramento, CA, April, 2000 to June, 2007*

- Responsible for managing the price forecasting subpractice within Navigant Consulting's Energy Market Assessment group. Responsibilities included a wide variety of engagements focused on evaluating wholesale power market conditions. Completed market assessment and simulation studies of all North American regional power markets, including Canada and Mexico.
- Created and Developed NCI's PROSYM market simulation practice and capabilities in modeling WECC and Eastern Interconnected markets. Completed numerous market simulation and assessment engagements throughout the U.S. covering all North American market regions.
- With a team of consultants, assisting the California Energy Commission in defining and evaluating scenarios for its 2007 Integrated Energy Plan. Reviewing market simulation results from each of the scenarios and completing analysis of industry and consumer risks likely to be faced in California over the next decade (ongoing).
- Directed NCI's market simulation efforts as independent consultant to the State of California Department of Water Resources, leading to the successful underwriting of \$11 billion in bond financing and supporting the execution of power supply agreements aggregating to over 13,000 MW.

- Developed projections of lost revenue and operating profits due to construction delays at a large combined-cycle project in the Desert Southwest. Prepared evaluation of WECC power market conditions during the construction period for this project, and completed power market simulations used to measure likely dispatch, revenue and operating profits of the project during the construction delay period. Successfully presented and defended those estimates before an Arbitration Panel, resulting in a significant financial award for our client.
- Completed PJM Market simulations and led analytical support for recent financing of a large coal plant in PJM-West. Worked closely with investment banks and rating agencies in identifying and assessing cash flow risks to the project.
- Prepared carbon regulation risk assessment of a new coal plant being developed in Nevada, to evaluate long-term potential impacts on project costs. Evaluated ratepayer risks associated with this new project.
- Developed and maintained power market simulations to evaluate likely dispatch, costs, and spot market purchases and sales associated with the California Department of Water Resources purchased power contract portfolio. Results from these simulations have been used in each of the last five years to support CDWR's annual revenue requirement filing before the California Public Utilities Commission. Provide ongoing regulatory support to CDWR, including consultation and limited training of CPUC staff in power market modeling.
- Directed a number of nationwide market simulation and valuation engagements examining current market value of power plant portfolios owned by Calpine, Mirant, NRG and other independent power producers. Worked with bond investors to develop refined valuation estimates for subsets of each portfolio.
- Served on WECC's Power Simulation Task Force which was formed to assess available options for the WECC to procure, maintain and use a power market simulation database and model in its generation and transmission planning efforts. Participated in task force meetings where criteria were developed for selecting a simulation database and model, and assisted in evaluating proposals submitted to the WECC task force
- Performed power market simulations of Mexico, using NewEnergy Associates' MarketPower simulation model. Developed market price forecast and dispatch analysis of the Altamira II project under a variety of projected fuel market conditions. Results from these analyses were used by Senior Lenders to evaluate ongoing feasibility of the project under its financing terms. Annual updates were provided to the lenders.
- Assisted a California investor-owned utility in conducting RFP and in evaluating bids received for short-term and medium-term power supply contracts. Developed cost rankings, economic screening, risk assessment and preferred bid evaluations, and assisted the utility's planning and bid evaluation staff in presenting results to the company's senior management.
- Developed WECC market simulations and assessment of investment conditions for numerous clients used in feasibility analysis and financing support of new generation projects being developed in WECC markets. These analyses included separate evaluation of power market conditions in California, Mexico (Baja), Arizona, Colorado, Nevada, Oregon, Washington, British Columbia, and Alberta.
- Reviewed and verified long-term resource plans of a major investor-owned utility located in the Desert Southwest region. Conducted power market simulations of preferred and competing resource plans and developed relative ranking of results.

*Senior Consultant, Henwood Energy Services, Inc., Sacramento, CA, 1998 to 2000*

- Prepared numerous forecasts of wholesale market electricity prices using Henwood's proprietary market simulation tools. Drafted reports presenting price forecasts to consulting clients. Worked closely with clients and sponsors of new merchant power plants to provide customized market price forecasts and to serve individual client needs. Presented study results to clients and their constituents.
- Directed project evaluation and revenue forecast for major merchant power plant in Texas. Presented revenue forecast to investment bankers, and to several potential equity investors. Advised and worked with project developer to successfully obtain debt and equity financing for the project, which is currently under construction.
- Conducted economic study of market rules and entry barriers faced by developers of new merchant power plants in domestic electricity markets. Applied study results to specific conditions in Texas. Met with a variety of industry representatives in Texas including project developers, transmission service providers, power marketers, utility regulators and environmental regulators to gather market intelligence and develop study conclusions.
- Advised and worked with PricewaterhouseCoopers to perform economic evaluation and market simulations of proposed Purchase Power Arrangements under development in Alberta, Canada. The Power Purchase Arrangements are to be sold at auction in coming months. Prepared economic study of market power held by incumbent electricity suppliers in Alberta.
- Developed software and modeling tools to estimate investment cash flows and pro forma financial results for new merchant power plants. Developed Henwood approach for evaluating profitability of new market entrants and incorporating equilibrium amounts of new entry in its market studies.

*Senior Financial Analyst, Public Service Commission of Wisconsin, Madison, WI, 1990 to 1998*

- Developed policy proposals for restructuring wholesale and retail electricity markets. Evaluated competing policy proposals for impacts upon consumers and upon electrical system operation. Drafted formal electricity industry restructuring policy adopted by the Wisconsin Commission.
- Developed policies for addressing wholesale and retail market power in Primergy and Interstate Energy Corporation merger cases. Evaluated feasibility and corporate finance implications of asset divestiture and spin-off options for mitigating market power.
- Presented evaluation of proposed electric utility merger legislation to subcommittee of Wisconsin legislature. Advised individual legislators on merger policy.
- Developed policy proposal and draft legislation for reforming power plant siting law and for allowing development of new merchant power plants in Wisconsin.
- Directed industry-wide efforts to revise the PSCW generation competitive bidding procedures. Conducted workshops on proposed revisions for utility and other industry participants. Drafted policy reforms adopted by the Wisconsin Commission.
- Conducted primary economic and engineering analysis of power plant proposals submitted in generation competitive bidding cases. Prepared financial analyses of key contract terms and risks. Evaluated economic and engineering characteristics of bid proposals using production

cost and system expansion computer modeling. Recommended preferred projects to Wisconsin Commission.

- Completed numerous financial analyses of new stock and bond issuances by Wisconsin investor-owned utilities to evaluate investment risks and impacts upon the corporation. Drafted formal administrative orders authorizing each issuance.

*Research Assistant, University of Wisconsin, Madison, WI, 1989-1990*

- Co-authored and provided research support for study of consolidation and mergers in the electric utility industry.

## EDUCATION

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*University of Wisconsin-Madison*

- Graduate Studies toward MS-Finance, September 1988 - May 1990.
- Bachelor of Business Administration, Finance, Investment and Banking, May 1988.
- Curriculum concentrated heavily upon financial economics, with additional emphasis upon economics, mathematics, and accounting.

## PUBLICATIONS

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*Electric Utility Mergers and Regulatory Policy*, Ray, Stevenson, Schiffman, Thompson. National Regulatory Research Institute, 1992.

*The Future of Wisconsin's Electric Power Industry: Environmental Impact Statement*, co-author, Public Service Commission of Wisconsin, October 1995, Docket 05-EI-114.

*Report to the Governor on Electric Reliability*, co-author, Public Service Commission of Wisconsin, Summer 1997.

**TESTIMONY**

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Public Service Commission of Wisconsin, Docket 6630-UR-104, Wisconsin Electric Power Company Rate Case, 1990, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 6690-UR-106, Wisconsin Public Service Corporation Rate Case, 1991, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 4220-UR-105, Northern States Power Company (Wisconsin) Rate Case, 1991, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Rate of Return on Equity, Cost of Capital and Financial Condition, Wisconsin Electric Power Company, Docket 6630-UR-105, Public Service Commission of Wisconsin, 1991

Public Service Commission of Wisconsin, Docket 05-EP-6, Advance Plan 6, 1992, "Alignment of Managerial Interests and Incentives with Integrated Resource Planning Goals" (with Paul Newman).

Public Service Commission of Wisconsin, Docket 6680-UR-107, Wisconsin Power & Light Company Rate Case, 1992, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 4220-UR-106, Northern States Power Company (Wisconsin) Rate Case, 1992, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 6630-UR-106, Wisconsin Electric Power Company Rate Case, 1992, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 05-EI-112, Investigation on the Commission's Own Motion Into Barriers to Contracts Between Electric Utilities and Non-Utility Cogenerators and Certain Related Policy Issues, 1992, "Contract Risk in Long-Term Purchase Power Arrangements."

Public Service Commission of Wisconsin, Docket 3270-UR-106, Madison Gas and Electric Company Rate Case, 1993, "Rate of Return on Equity, Cost of Capital and Financial Condition."

TESTIMONY (CONTINUED)

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Public Service Commission of Wisconsin, Docket 6630-CE-187, Wisconsin Electric Power Company, 1993, "Memorandum to Commission Presenting Economic Analysis of Competitively Bid Proposals for New Power Plants" (co-authored).

Public Service Commission of Wisconsin, Docket 6680-UR-108, Wisconsin Power & Light Company Rate Case, 1993, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 4220-UR-107, Northern States Power Company (Wisconsin) Rate Case, 1993, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 6630-CE-202, Wisconsin Electric Power Company Auburn to Butternut Transmission Line Case, 1994, "Economic Cost Comparison of Transmission Upgrade and Distributed Generation Wind Turbine Project."

Public Service Commission of Wisconsin, Docket 3270-UR-107, Madison Gas and Electric Company, 1994 "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 6690-CE-156, Application of Wisconsin Public Service Corporation for Authority to Increase Electric Generating Capacity (Stage One Competition Among Alternative Suppliers), 1994 & 1995, "Economic Analysis of Competitively Bid Power Plant Proposals" (with Paul Newman), "Contract Risk in Purchased Power Arrangements," "Accounting Treatment for Long-Term Purchased Power Contracts," "Contract Risk and Analysis of True-Up Mechanisms and Balancing Accounts."

Public Service Commission of Wisconsin, Docket 6630-UM-100/4220-UM-101, Wisconsin Electric Power Company/Northern States Power Company Merger Case, 1996, "Market Power Remedies; State/Federal Jurisdictional Issues."

Public Service Commission of Wisconsin, Docket 05-EP-7, Advance Plan 7, 1996, "Risk-Adjusted Discount Rates."

TESTIMONY (CONTINUED)

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Public Service Commission of Wisconsin, Docket 6680-UM-100, WPL Holdings/IES Industries/Interstate Power Merger Case, 1997, "Market Power Remedies; State/Federal Jurisdictional Issues."

Public Service Commission of Wisconsin, Docket 6630-UR-110, Wisconsin Electric Power Company Rate Case, 1997, "Rate of Return on Equity, Cost of Capital and Financial Condition."

Public Service Commission of Wisconsin, Docket 05-EP-8, Advance Plan 8, 1997, "Purchased Power Costs, Supply Planning Risks and Supply Planning Parameters."

North Dakota Public Service Commission, Docket No. PU-399-01-186, Montana-Dakota Utilities Co., 2000 Electric Operations Annual Report (Commission Investigation of Excess Earnings), February, 2002, "Wholesale power market conditions in the upper midwest, and the impact on the level and profitability of off-system sales for Montana-Dakota Utilities Co."

California Public Utilities Commission, Rulemaking 02-01-011 Implementation of the Suspension of Direct Access Pursuant to Assembly Bill 1X and Decision 01-09-0. June, 2002. "Rebuttal Testimony of Roger Schiffman on behalf of the California Department of Water Resources: Market modeling issues."

Washington DC Arbitration Panel, "Estimate of lost energy sales and lost revenue due to construction delay" for two new combined cycle projects that were built in Michigan and Arizona markets, January-February, 2006.

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Wednesday, December 06, 2017 7:45 AM  
**To:** Bedwell, Heidi  
**Subject:** Energize Eastside Updates and participating in the CUP process

Ms. Bedwell-

I am reading the "Energize Eastside Updates" on the City of Bellevue website.

The website indicates that PSE has submitted an application for a CUP on a portion of the Energize Eastside line. There was a meeting on November 14 but unfortunately I did not receive a notice of that meeting. I have reviewed the Power Point presentation that was made at that meeting.

The website also states the following:

*" Individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) to be a party of record for the CUP/CALUP applications."*

I am a little confused. Please clarify for me. Should I be submitting my name and address now in order to be a party of record for the CUP application? If so, who do I submit that to?

As you know, I have submitted many documents regarding Energize Eastside in the EIS process. The website indicates I will need to submit them again in this CUP proceeding. I want to be sure I am able to do that.

Richard Lauckhart  
44475 Clubhouse Drive  
El Macero, CA 95618  
lauckjr@hotmail.com  
Former VP at Puget

Participating on behalf of the interest of many concerned citizens on the East side.

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Wednesday, December 06, 2017 8:05 AM  
**To:** Bedwell, Heidi  
**Subject:** Re: Energize Eastside Updates and participating in the CUP process

Thanks for this prompt reply.

So as I understand it, I can start now to submit comments to you regarding the Energize Eastside CUP application. I submit those to you.

Is that correct?

Richard Lauckhart

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**From:** HBedwell@bellevuewa.gov <HBedwell@bellevuewa.gov>  
**Sent:** Wednesday, December 6, 2017 7:58 AM  
**To:** lauckjr@hotmail.com  
**Subject:** RE: Energize Eastside Updates and participating in the CUP process

Good morning Mr. Lauckhart,

The EIS process and the permitting process are separate as noted on the webpage. Comments that address PSE's Conditional Use Permit (CUP) or Critical Areas Land Use Permit (CALUP) should be submitted as part of the City's permit review land use process. Like the EIS process, comments should be directed to me. My contact information is also on the webpage. Prior submission of comments concerning the EIS during the EIS comment periods does not automatically make the EIS commenter a party of record regarding the City's subsequent review of PSE's specific permit applications. This is the same for all of the jurisdictions whom PSE must receive permits from. Please note that the above-described land use process does not necessarily mean all comments submitted previously as part of the EIS process need to be resubmitted as part of the permit review process. In fact, the most appropriate comments during the permit review process would address PSE's specific permit applications, the current proposal, and the city codes and standards applicable to the permit applications.

If you're interested in receiving alerts regarding information posted to the permit page I'd encourage you to subscribe via the button on the webpage that looks like this:

## Alerts

Receive email or text notification when this page is updated

Subscribe

Hope this helps to clarify so you can continue to participate in the process as you are able. Have a great day!



### Heidi M. Bedwell

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Richard Lauckhart [mailto:lauckjr@hotmail.com]  
**Sent:** Wednesday, December 06, 2017 7:45 AM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Subject:** Energize Eastside Updates and participating in the CUP process

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I am a little confused. Please clarify for me. Should I be submitting my name and address now in order to be a party of record for the CUP application? If so, who do I submit that to?

As you know, I have submitted many documents regarding Energize Eastside in the EIS process. The website indicates I will need to submit them again in this CUP proceeding. I want to be sure I am able to do that.

Richard Lauckhart  
44475 Clubhouse Drive  
El Macero, CA 95618  
[lauckjr@hotmail.com](mailto:lauckjr@hotmail.com)  
Former VP at Puget

Participating on behalf of the interest of many concerned citizens on the East side.

## Bedwell, Heidi

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**From:** Russell Borgmann <rborghmann@hotmail.com>  
**Sent:** Saturday, November 18, 2017 8:28 AM  
**To:** Bedwell, Heidi; Stead, Elizabeth; Helland, Carol; Brennan, Mike  
**Cc:** Russell Borgmann  
**Subject:** Energize Eastside: Permit Questions  
**Attachments:** Energize Eastside Permit Questions 11-18-2017.pdf

Hi Heidi,

Please include the attached comments and questions as part of the Energize Eastside Permitting public comments. Please confirm receipt of these comments.

Please let me know if you have any questions.

Sincerely,

Russell Borgmann  
2100 120th Place SE  
Bellevue, WA 98005

## Topic 1: Bifurcated Permit

Only *after* the Energize Eastside Public Comment Period closed did PSE disclose their decision to divide the project into two halves: the South Segment and the North Segment. Why?

Bifurcating the permitting process invalidates the current EIS. At over 800 pages, the current EIS never disclosed this approach. At the very minimum, a Supplemental EIS is required. What are the risks associated with splitting this project? How will it work? What happens if one segment encounters permitting problems? How will an incomplete line increase reliability to customers?

Many questions remain unanswered. Lack of clarity and failure to disclose information related to the change of plans to bifurcate the permitting requires more study, more disclosure to the public, and additional time for public feedback via Public Open Comment Periods. A Supplemental EIS shall be required.

## Topic 2: Inadequate Public Outreach (SEPA EIS Element)

The City only sent out public notices to those within 500 feet of the proposed line. 500 feet. In some instances that's barely the size of a property owner's lot or parcel. In discussions with the Deputy City Manager and Bellevue Development Services Department, 500 feet is an arbitrary distance. It is not governed by statute or code.

The City is shirking its responsibility to residents by not providing broader Public Notice, alerting residents to the risks associated with this project. A strong argument can be made that ALL PSE customers should be notified about this project. ALL PSE customers are affected by this proposed project, especially in the form of higher electricity rates. Energize Eastside will increase rates for electricity. ALL PSE customers will pay for Energize Eastside – costing customers over \$1 Billion Dollars over the lifetime of this project. We will be stuck paying for this dinosaur for the next 40 years. Remember how long it took to pay off WHOOPS?

Additionally, the Draper Study (2005) found that corona can drift in the wind much farther than anticipated, in excess of 600m (**2,000 ft**). Based on the Draper study, EIS notices should have been sent out to all affected residents a **minimum of a 2,000 feet radius** along the selected route.

How will the City of Bellevue address inadequate Public Notice?

- Draper Study (2005) found that corona can drift in the wind much farther than anticipated, in excess of 600m (2,000 ft)
- 2005 Draper, et. al. UK Study (1962-1995) Leukemia RR of 1.69 for children living <200 meters from HVTL; Leukemia RR of 1.23 for children living 200-600 meters from HVTL
- Henshaw/Fews 2001 Study (Univ. of Bristol, Human Radiation Effects Group, [www.electric-fields.bris.ac.uk/](http://www.electric-fields.bris.ac.uk/)) showed a 20-60% increase in deposition of airborne pollutants in close proximity to High Voltage Transmission Lines. **Corona** attach to whatever is available—car exhaust, radon, radon progeny and other pollutants that are known carcinogens. These airborne pollutants are then inhaled and retained on skin. There is greater risk of impact to the lungs. The British Government National Radiological Protection Board says power line generated **corona** may result in excess cases of lung cancer.

### Topic 3: Non-standard EIS Process

The Process employed by the City of Bellevue for this particular Energize Eastside EIS deviates from previous EIS process. The Energize Eastside process is not consistent with WA Department of Ecology SEPA guidelines. The City deviated from its standard SEPA EIS process for Energize Eastside. Why?

This project *never* got a fair, impartial Programmatic EIS that explores Purpose, Need, and *all* Viable Alternatives. Why?

Technological advances since this project was first conceived over 10 year ago make Energize Eastside an obsolete project – a relic of a bygone era. More viable alternative exist to decentralize our electrical grid and improve the region’s electrical reliability. These solutions are scalable and can be deployed as need develops over time – and can be implemented at a fraction of the cost of Energize Eastside. These alternatives are also more environmentally safe, requiring less EIS mitigations. Why isn’t the City representing its citizens by promoting 21<sup>st</sup> century solutions (Battery Storage, Demand Response, Non-Wire Alternatives – NWA) to keep electricity rates at the most affordable cost for all consumers?

#### Questions

1. Please provide an explanation, legal justification, and examples of other DEIS and EIS that have been recently prepared following the same approach that the City of Bellevue has employed on the Energize Eastside EIS.
2. Viable Alternatives: PSE’s technical consultants claimed to have asked the WA Department of Ecology for permission to install a peaking generator but was turned down. Where is that report? Why is PSE’s request, Department of Ecology’s response, and the report not included in this EIS or other public records? Please detail why the cost and environmental impact to install a peaking generator is more than the environmental impact of the proposed Energize Eastside project. Where is the comparative analysis of those two alternatives? Where is a comprehensive, up-to-date analysis of Battery Storage to satisfy the Eastside’s future electricity needs?

### Topic 4: ALTERNATIVES

Several viable alternatives have been previously submitted into the EIS Public Record for Energize Eastside. Several Case Studies have been submitted during this EIS to provide evidence that other viable alternatives exist and are currently in-use throughout the U.S. The EIS fails to adequately discuss or address the alternatives and case studies that have been submitted. As such the only viable alternative presented in the EIS is the “NO ACTION” alternative. Permits should be denied.

The EIS does not adequately evaluate many viable alternatives that been submitted throughout the entire EIS process. This EIS must compare the environmental impact of each viable alternative.

PSE has publically stated that “Energize Eastside is the only way.” Ms. Leann Kostek, (original PSE Energize Eastside Project Manager) acknowledged that PSE had not considered any other solution than poles and wires. PSE clearly defined the box for the solution: poles and wires – and as such they are allowing only *their* solution to be studied. Other Non-Wire Alternatives (NWA) have been quickly dismissed or side-stepped.

Against PSE's "you-can-only-discuss-our-project" mantra, the Phase 2 Draft EIS (Section 1.3) states, *"The lead agency is responsible for ensuring that a proposal that is the subject of environmental review is properly defined. The process of defining the proposal includes an understanding of the need for the project, to enable a thorough understanding of the project's objectives."*

Given that language, the EIS and permitting process is incomplete and flawed when it fails to objectively compare and evaluate viable alternatives that are in-use elsewhere in the U.S. to solve the precise problem that PSE has described – a transmission deficiency during peak electrical demand. There are less expensive, more safe, more environmentally sound alternatives available to the City of Bellevue.

**Navigant Research** just published a report (June 2017) on how the industry is adopting "non-wires alternatives" instead of more transmission lines. Below are just some of the interesting quotes contained in this report:

*"Traditionally, when a transmission or distribution system operator needed to upgrade or replace infrastructure due to aging equipment or increased load demand, it would simply conduct poles and wires projects. However, grid management and distributed energy resources (DER) technologies have improved, utilities are looking to engage customers more, and policy concerns related to cost and the environment have grown. In reaction, more creative solutions are being explored to address infrastructure needs at a lower cost with greater customer and environmental benefits. These types of projects are known as non-wires alternatives (NWAs)...it appears that NWAs are ready to become a bigger piece of the transmission and distribution (T&D) investment picture based on advancements in DER technology and utility willingness to try new means of infrastructure replacement."*

According to Navigant Research, global NWA spending is expected to grow from \$63 million in 2017 to \$580 million in 2026. NWAs were quickly dismissed by PSE in the EIS. Mr. Jens Nedrud (former PSE Energize Eastside Project Engineer) stated in 2014: *"When this new line needs to be replaced, and it should last through at least the 2030s, I hope battery technology has advanced to the point that we can use that instead. But so far, no other utility has used it for application to an area this large."*

<http://www.seattletimes.com/seattle-news/pse-faces-opposition-over-options-for-eastside-power-line-route/>

This assertion can now be refuted. Southern California Edison (SCE) provides 14 million people with electricity across a service territory of approximately 50,000 square miles (PSE serves 1.1 million customers across 6,000 square miles). SCE is rough 10 TIMES bigger than PSE. SCE had an immediate need for a peak demand solution: SCE had lost methane gas reserves that were needed to meet peak electricity demand that winter. Tesla installed a large battery installation in mere months, satisfying SCE's need, immediately.

PSE's need will develop gradually over time, based on PSE's (exaggerated) demand forecast. If the need exists at all (which is unlikely), PSE could solve their peak demand problems the same way that SCE solved them – with battery storage. Additionally, this storage would provide the added benefits of increased reliability and reduced carbon emissions.

Here is an opportunity for PSE to compromise: Although PSE has not proven or technically justified the need for Energize Eastside, they could provide a scalable battery storage project to satisfy any concerns about "rolling blackouts".

If, in the distant future, the need does materialize for Wired Alternatives, these alternatives are appropriate for evaluation:

- Monroe-Echo Lake #2: Re-evaluate BPA's best technical solution (lowest risk, TCRM, and highest transfer capacity, TTC) by building a second Monroe-Echo Lake transmission line.
- Lake Tradition Option: Re-evaluate PSE's plan-of-record until approximately 2011 to route power from Lake Tradition along I-90 to the Lakeside Substation.
- Reconductor 115kV lines to improve transmission efficiencies.
- SCL Loopback: Add a new 230/115kV transformer at Lakeside Substation. Loop the existing Seattle City Light double circuit 230kV line through the Lakeside Substation. Route the line east along I-90 then turn north to the Lakeside Substation. Continue along the existing PSE right-of-way north of the Lakeside Substation. Turn west near the Lake Hills Connector until the SCL lines are once again intercepted. This has significantly less environmental impact than 18 miles of new transmission lines. This could have the added benefit of removing 230kV SCL lines that currently run over the top of the Woodridge neighborhood – over the top of a public elementary school and two community swimming pools.
- Underground installation of portions of the line through dense urban areas
- Submerging the line if a route under Lake Washington can be found viable

## Questions

1. How will the City of Bellevue explain why batteries can, or cannot, meet the Eastside's peak demand needs?
2. How will the City of Bellevue ensure it is working on behalf of its citizens to provide reliable, fairly-priced electricity by examining viable alternatives?
3. How will the City of Bellevue justify excessive infrastructure environmental damage (and economic consequences) in the face of lower cost, more reliable, safer alternatives?

## Topic 5: Low Impact Development (LID) Principles and Tree Canopy

Low Impact Development (LID) Best Management Practices (BMPs) are required for new development and redevelopment of a certain size in the City of Bellevue. As of December 31, 2016, the City adopted the Department of Ecology 2012 Stormwater Management Manual for Western Washington (as amended in December 2014). To comply with the City's 2013-2018 National Pollution Discharge Elimination System (NPDES) Permit, the City has adopted Ordinance No. 6323 which includes amendments to the Bellevue Land Use Code that address the following LID principles:

- Measures to minimize impervious surfaces.
- Measures to minimize loss of native vegetation.
- Other measures to minimize stormwater runoff

Beginning December 31, 2016, new development and redevelopment in the City is required to reduce impervious surfaces on proposed development sites, with the option to make up the balance of the site coverage with permeable surfaces, if technically feasible.

The City of Bellevue has adopted Ordinance No. 6323 which includes amendments to the Bellevue Land Use Code that address LID principles, including measuring and minimizing loss of native vegetation.

<https://development.bellevuewa.gov/zoning-and-land-use/environment-and-critical-areas/low-impact-development/>

Low Impact Development (LID) Principles are a state-mandated approach to site development, specifically to minimize native vegetation loss to meet newly adopted tree canopy targets. LID also supports the City Council's vision of a high-quality built and natural environment for Bellevue. LID Principles apply to Land Use Code and Transportation Code. It's only logical that LID principles also extend to infrastructure projects, like electric utilities. One of the key Land Use Code goals is to preserve and enhance the tree canopy, because it is recognized how important the tree canopy is to storm run-off, air pollution reduction, and noise/light/glare reduction.

Energize Eastside is slated to destroy at least 327 ACRES of native vegetation. How big of an area is that? BIG. That is an area equivalent in size to the ENTIRE DOWNTOWN BELLEVUE corridor – from Main St. to NE 12<sup>th</sup> St., from Bellevue Way to I-405. LID Principles are state-mandated governance to minimize native vegetation loss, and to preserve and enhance the tree canopy. This is not a question of aesthetics. Trees and native vegetation are essential to address storm run-off, steep slope retention, minimize noise/light/glare pollution, and scrub our air of pollutants while converting CO2 to oxygen. LID Principles protect vegetation essential for surface water management and pollution control. LID Principles are designed to protect the safety, health, and livability of our communities by promoting sustainable growth. On April 22, 2016, the *"EPA gave King County a D for high-ozone days and a C for short-term particle pollution...The report ranked the Seattle-Tacoma area the 26<sup>th</sup> worst metropolitan area in the country for short-term particle pollution..."* Transmission line induced corona create charged particles which readily attach to pollution, exacerbating our region's existing pollution problems. These particles can lodge deep in the lungs, aggravating asthma, increasing respiratory symptoms, decreasing lung function, and complicating cardiovascular issues.

[http://www.seattletimes.com/seattle-news/seattle-areas-air-quality-gets-poor-grades/?utm\\_source=email&utm\\_medium=email&utm\\_campaign=article\\_left\\_1.1](http://www.seattletimes.com/seattle-news/seattle-areas-air-quality-gets-poor-grades/?utm_source=email&utm_medium=email&utm_campaign=article_left_1.1)

Energize Eastside will result in the destruction of over 5,400 mature trees and other crucial vegetation. The eastside's tree canopy is essential for health as well as the reduction of light and glare, especially nighttime light pollution. Bellevue's tree canopy has already decreased to 36%, the lowest along the Puget Sound eastside. Energize Eastside will significantly contribute to this rapidly dwindling tree canopy.

[http://www.ci.bellevue.wa.us/pdf/Manager/Urban\\_Ecosystem\\_Analysis.pdf](http://www.ci.bellevue.wa.us/pdf/Manager/Urban_Ecosystem_Analysis.pdf)

## Questions

1. How will the City justify building Energize Eastside, which violates Low Impact Development (LID) Principles enacted by City Ordinances?
2. The EIS and permitting only addresses short-term light and glare concerns during the construction phase. How will the City of Bellevue mitigate long-term light and glare concerns?
3. Will 130ft poles require flashing beacons to alert low flying private aircraft of tall aerial obstructions, especially in areas that cross I-90 or over Somerset?

## Topic 6: Energize Eastside is Not an Essential Public Facility (EPF)

The statute on Essential Public Facilities (EPFs) is RCW 36.70A.200. Facility designation to transmission lines are expressly excluded from the EPF definition in Washington Administrative Code. Exclusion of

transmission lines was not an oversight – they were expressly omitted from the definition of facilities that qualify as an Essential Public Facility.

Energize Eastside does NOT meet the definition of an EPF. Per the City of Bellevue’s Comprehensive Plan, “ the Growth Management Act defines essential public facilities as those “that are typically difficult to site, such as airports, state education facilities and state or regional transportation facilities as defined in RCW 47.06.140, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities mental health facilities, group homes, and secure community transition facilities as defined in RCW 71.090.020.”

Several documents and comments have been previously submitted throughout the EIS process and during Public Comment Periods to provide evidence that Energize Eastside does not meet the standard for an EPF.

### Questions

1. How can Energize Eastside be deemed an EPF when it has been independently shown NOT to be essential to other directly affected jurisdictions (Renton, Newcastle, Redmond, and Kirkland)? PSE publically states that Energize Eastside is intended to serve block loads in Bellevue.
2. How will the City justify the erroneous application of the Essential Public Facility designation on Energize Eastside, when transmission lines are specifically and intentionally omitted from the legal definition for an “Essential Public Facility”?
3. Why hasn’t PSE petitioned EFSEC to address the Energize Eastside project?
4. Why aren’t City Staff and City Council pressing PSE on this question to get a full, accurate, and well-reasoned answer as to why PSE is not presenting the Energize Eastside project to EFSEC?
5. Why aren’t PSE’s answers to the EFSEC question being publically disclosed to inform the general public?
6. Will the lingering questions and questionable data justifying the Energize Eastside project withstand analysis and scrutiny by EFSEC?
7. What does the City of Bellevue (acting as SEPA Lead Agency) have to lose by denying the Energize Eastside permits, thereby forcing PSE’s hand to submit Energize Eastside before EFSEC?

### Topic 7: Build Environment (EIS Element in SEPA not covered in EIS)

Many houses are closer than 130 feet to the monopole sites. If a monopole were to fall (e.g. in an earthquake, sustained high winds, etc.), it could hit homes. Houses within the fall zone of transmission poles are not eligible for financing from certain lenders (FHA, etc.) and may have difficulty in obtaining/retaining homeowners’ insurance policies. Where are the studies showing that NERC/FERC requirements have been met for homes that are within the “fall zone” of the proposed 100ft+ tall monopoles?

### Topic 8: NEPA REVIEW

**Bonneville Power Administration documentation (in addition to Memoranda of Agreement) states that all Lakeside Transformer (Bellevue) 230kV activities fall under NEPA.**

Mr. Pyle (former City of Bellevue Sr. Environmental/Land Use Planner charged with the Energize Eastside EIS, now replaced by Ms. Heidi Bedwell) said that BPA has provided a letter stating that BPA is not involved with the Energize Eastside project (aka: Sammamish-Lakeside-Talbot project).

On the City of Bellevue EIS Scoping website , a MOA (amended April 2015, link included below) 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 Order 1000 cost allocation requirements. This maneuver is also an attempt to avoid triggering a NEPA review. BPA is obviously playing a financial shell game.

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.”* Seattle City Light is complicit in the shell game and is being forced to pay PSE, so that BPA can no longer appear to have any financial obligation.

BPA is going out of its way to misdirect and divert funds from a broader REGIONAL project to address west coast grid reinforcement (Energize Eastside) to avoid a NEPA review and circumvent compliance with FERC Order 1000.

The Mid-West Electric Consumers Association states on their ***Funding the Federal Power Program*** fact sheet, *“...due to ongoing federal budget crisis, appropriations from the U.S. Treasury will not be available to fund capital programs such as new construction and replacement or rehabilitation of existing facilities...For two decades, administrations’ Budget Requests for funding of the federal power program have steadily decreased...Customer funding has become an important funding source...”* Translation: Local ratepayers (like PSE customers) are being forced to finance new construction, replacement, and rehabilitation of electrical infrastructure that provides benefits to a substantially larger base of beneficiaries throughout the west coast region. Electricity grid reinforcement is paramount to national security and economic wellbeing. However, implementation is being abused.

Some U.S. **utilities (like PSE) are “gold-plating” their infrastructure projects** to qualify for higher rates of Return On Equity. The Federal Power Program is leveraging individual utilities to address grid reinforcement. FERC has programs that provide EXTRA incentive (a higher rate of Return On Equity, ROE) to reward utilities for infrastructure investment that reinforces the electrical grid. In turn, those individual utilities get to charge their local customers for projects that have more far-reaching goals beyond just benefitting local ratepayers. Outdated WA state legislation sadly REWARDS PSE for over-building infrastructure.

*“The state’s electric utility and regulatory framework were developed in an era in which demand for electricity consistently increased, technology changed incrementally, customers exerted little control over their electricity demand, electricity flowed one-way from the utility to customers, and the risks of climate*

*change were unknown.”* That was written about the state of Rhode Island, but it perfectly captures the situation in WA.

<http://meconsumers.com/wp-content/uploads/2013/02/Funding-Federal-Power-2013.pdf>

<http://www.wsi.com/articles/utilities-profit-recipe-spend-more-1429567463>

<https://microgridknowledge.com/grid-modernization-microgrid-2017/>

## Questions

1. Why has the City of Bellevue overlooked crucial binding documentation requiring Energize Eastside to submit for NEPA review?
2. If BPA is not involved in Energize Eastside, why are there BPA Memoranda of Agreement (MOA) included on the City of Bellevue EIS scoping website?  
[http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/2015-06-01\\_moa\\_with\\_bpa-seattlecitylight-pse.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/2015-06-01_moa_with_bpa-seattlecitylight-pse.pdf)
3. Why would Seattle City Light pay PSE, if Energize Eastside is solely to address Puget Sound eastside (local) load growth?
4. Where is the WA Department of Ecology determination of the need for a NEPA review?

## Topic 9: CRITIQUE of “5 INDEPENDENT STUDIES”

Several documents and comments have been previously submitted throughout the EIS process and during public comment periods to call into question the “5 independent studies that justify the need for Energize Eastside”. Those 5 studies include:

1. The **EXPONENT** Reliability Report
2. PSE’s ***Eastside Needs Assessment Report***
3. **Quanta** Services Report
4. Utility Systems Efficiencies, Inc. (***The U.S.E. Report***)
5. The **Stantec** Report

The **EXPONENT** Report concluded that Bellevue’s electrical reliability exceeds WUTC goals for SAIDI and SAIFI. EXPONENT urged the City of Bellevue to retain on-staff electrical reliability expertise to independently analyze and assess future needs.

PSE’s ***Eastside Needs Assessment Report*** cannot qualify as an independent study since it was conducted by PSE. It contains assumptions that far exceed NERC reliability standards.

The **Quanta** Study appears to be the first time PSE has used outside consultants to perform load flow studies. Even though PSE has internal capability and sophisticated software to perform their own load flow studies, why did PSE hire Quanta to conduct the Energize Eastside load flow study? Quanta is known to perform significant consulting for PSE’s parent owner, Macquarie – not exactly an independent voice.

The Quanta study started with the “2018 Base Case” and then added other critical assumptions that far exceed NERC reliability standards (sending 1,500MW to Canada, temperatures below 23F, 2 of 4 transformers offline, 6 west-of-Cascade emergency generators offline – all simultaneously) that stressed the Bulk Electrical System well beyond hypothetical NERC reliability limits. By imposing these assumptions, Quanta’s load flow study created cross-Cascade (east-west) transmission problems – there wasn’t enough electricity available to flow over the Cascades to meet these extreme conditions.

The **USE Report** found that when 1,500MW of transfer from Canada was eliminated from the study that only one small overload occurred at the Talbot Hill substation (Renton) that could be rectified by other more simple, much less costly solutions (redundant transformer).

Keri Pravitz (PSE) told me during the City/PSE presentation on 11/14/2017 that “an F is an F” – meaning a failure is a failure. PSE’s comment FAILS. PSE’s comment fails to take into account the nature of the “failure” (a minor overload of one transformer in the Talbot Hill substation) and the MAGNITUDE of the “failure” (the USE report found the transformer barely exceeded its nameplate capacity rating). This “failure” does not cause the transformer to fail. IF the transformer briefly exceeds its nameplate rating, it could merely affect the long term longevity of the transformer. This minor overload can easily be remedied by more simple, less costly solutions than building an entire transmission line for 18 miles through 5 urban cities.

The **Stantec** Report appears to have rubber-stamped PSE’s study without providing independent analysis. The Stantec Report only validated that PSE had followed its own process.

### Questions

1. Why has the City of Bellevue not hired electrical reliability expertise as recommended in 2012 by EXPONENT?
2. How does the City of Bellevue respond to criticism that the **Eastside Needs Assessment Report** contains assumptions that far exceed NERC Reliability Standards, while providing no measurable increase in reliability for PSE customers?
3. How does the City of Bellevue respond to criticism that there are less expensive ways to address overloads at the Talbot Hill substation in lieu of building Energize Eastside?
4. Quanta, U.S.E and Stantec (all consultants) will NOT take a stance against PSE for fear of retaliation in the form of losing future lucrative consulting contracts from PSE and other utilities. How does the City of Bellevue plan to respond to clear conflicts of interest on the part of Quanta (known to do substantial work for PSE’s owner, Macquarie), U.S.E., and Stantec?
5. Stantec did not independently analyze PSE’s load forecast. Stantec accepted PSE’s inputs as fact and verified that PSE had followed an industry-standard process. Why didn’t Stantec obtain independent data from unbiased third-parties, rather than rely strictly on data provided by PSE?
6. How will the City of Bellevue ensure they are making the best long-term decisions for residents to provide reliable, fairly-priced electricity?

### Summary

*“The state’s electric utility and regulatory framework were developed in an era in which demand for electricity consistently increased, technology changed incrementally, customers exerted little control over their electricity demand, electricity flowed one-way from the utility to customers, and the risks of climate change were unknown,”* said the report, which was issued by Division of Public Utilities & Carriers (DPUC), Office of Energy Resources and the Public Utilities Commission.

The above was written about the state of Rhode Island. Those words perfectly describe our situation in Washington. The entire article is worth reading:

<https://microgridknowledge.com/grid-modernization-microgrid-2017/>

None of these factors are true today:

1. Electricity demand is NOT consistently increasing. It is consistently flat-to-declining, even in the face of a robust, booming economy and population growth
2. Energy efficiency and technology continue to grow and mature exponentially, far faster than late-adopter, risk-adverse utilities appear able to react
3. Customers are able to exert far more control on their electricity demand by using appliances that we can schedule when to operate (reducing peak demand load), implementation of energy conserving building materials, and installation of decentralized micro-generation (solar, wind) to increase individual reliability and reduce reliance on their utility
4. Customers CARE about the risks of climate change, and are changing their energy usage habits to reflect their concern for the environment. Customers want even more choices to pivot away from a utility that relies on 33% of its power from coal-fired sources (PSE/Colstrip)

Even though the state's regulatory framework is outmoded, the City has a fiduciary responsibility to its citizens to provide the most reliable electricity at the most affordable cost. ENERGIZE EASTSIDE IS NOT THE ANSWER. There are more safe, more reliable, less expensive alternatives. The City has a responsibility to its citizens to explore and implement those alternatives.

For all of these reasons, and a myriad more, the answer is clear:



## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Monday, November 20, 2017 2:03 PM  
**To:** Russell Borgmann; Stead, Elizabeth; Helland, Carol; Brennan, Mike  
**Subject:** RE: Energize Eastside: Permit Questions

Confirming receipt of comments.



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Russell Borgmann [mailto:rborgmann@hotmail.com]  
**Sent:** Saturday, November 18, 2017 8:28 AM  
**To:** Bedwell, Heidi ; Stead, Elizabeth ; Helland, Carol ; Brennan, Mike  
**Cc:** Russell Borgmann  
**Subject:** Energize Eastside: Permit Questions

Hi Heidi,

Please include the attached comments and questions as part of the Energize Eastside Permitting public comments. Please confirm receipt of these comments.

Please let me know if you have any questions.

Sincerely,

Russell Borgmann

2100 120th Place SE

Bellevue, WA 98005

## Bedwell, Heidi

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**From:** Russell Borgmann <rborgmann@hotmail.com>  
**Sent:** Saturday, November 18, 2017 7:09 PM  
**To:** Bedwell, Heidi; Stead, Elizabeth; Brennan, Mike; Helland, Carol  
**Cc:** Russell Borgmann  
**Subject:** Energize Eastside Permit Comments: Tree Canopy is about QUALITY AND QUANTITY

Please add these comments to the Energize Eastside Permit Public Comments. Please confirm receipt of these comments.

### **Tree Canopy: QUALITY and QUANTITY**

PSE has stated that their goal is to have MORE trees, not less, once their project is complete. However, tree canopy is not solely a question of quantity, but also QUALITY. According to Professor Timothy Fahey (Cornell University) a mature tree canopy (50 years) can sequester 30,000 lbs of carbon dioxide per acre and emit about 22,000 lbs of oxygen. According to the EIS, Energize Eastside will denude the equivalent of 327 acres. Destroying over 300 acres of mature native vegetation could result in escalating carbon dioxide levels by at least 9 MILLION pounds. How much is that? That is the equivalent of burning an additional 450,000 gallons of gasoline. With vehicles averaging approximately 25 miles/gallon, that's the equivalent of driving an additional 11 million miles, or adding approximately 900,000 vehicles per year to Puget Sound region highways. It will take MANY, MANY years for young vegetation and saplings to make up for the loss of mature tree canopy. In the meantime, the region's pollution and greenhouse gas emissions will escalate. Tree canopy is about the QUALITY and QUANTITY of mature vegetation.

How will the City of Bellevue respond to criticism about escalating pollution and greenhouse gas emissions as the result of Energize Eastside? Energize Eastside is a triple whammy:

1. it increases greenhouse gas emissions by stripping the region of mature vegetation so less carbon emissions are sequestered
2. Young saplings will not generate and emit nearly as much oxygen, until they mature - requiring SEVERAL DECADES
3. Energize Eastside transmission lines will generate corona, which is proven to attract airborne particles, thereby further increasing pollution in the region

How will the City of Bellevue respond to failure to adhere to Low Impact Development (LID) Principles enacted by the City of Bellevue, specifically related to mature tree canopy? LID is about more than storm water management.

Sincerely,

Russell Borgmann

2100 120th Place SE

Bellevue, WA 98005

## Bedwell, Heidi

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**From:** Russell Borgmann <rborgmann@hotmail.com>  
**Sent:** Friday, November 17, 2017 6:46 AM  
**To:** Bedwell, Heidi; Stead, Elizabeth; Brennan, Mike; Helland, Carol  
**Cc:** Russell Borgmann  
**Subject:** Energize Eastside Permit Application Comments

Hi Heidi,

Thank you for hosting Tuesday evening's presentation on Energize Eastside permitting. I know how difficult your job is. I'm surprised that all Permitting comments go to your work email address directly? It seems like your inbox is going to get flooded with comments! Doesn't the City usually set up a separate email address to keep track of all incoming comments?

Please include the following comments as part of the Energize Eastside Permitting comments.

I must say that I am disappointed in the "PROCESS". The meeting format really only allowed one-way communication from the City (and PSE) to residents. It is unfortunate that Q&A could only happen 1-on-1, not allowing residents to benefit from hearing answers to others' questions. I hope we can remedy this format for future meetings?

PSE clearly stated they care about two things: SAFETY and RELIABILITY. Keri Pravitz reiterated that to me personally during the "Open House" at the end of the meeting. However, those claims ring hollow. The existing power corridor was sublet to the Olympic Pipeline - not visa versa. The power lines were installed first, THEN the pipeline. That order of construction is important. Now PSE wants to go in and dig around aging pipelines to install new poles for a power line to carry 4X more power. This is a recipe for DISASTER. PSE has an abysmal safety record with gas pipelines (despite their claims to the contrary). Remember the Greenwood neighborhood explosion? And those are PSE natural gas pipelines that they own and presumably know where they are located. PSE is not the owner of the Olympic Pipeline. PSE doesn't know the nuances of how the pipelines were installed, and how they operate. There is more than one pipeline. And those are BIG pipelines (16" diameter and 20" diameter) with JET FUEL flowing at 700 PSI. Jet fuel is much more highly volatile than natural gas. We are being asked to trust PSE? How can the City take PSE's safety claims seriously? The evidence overwhelmingly outweighs PSE flimsy safety claims. The City is exposing themselves to serious liability by even contemplating allowing PSE to install power lines on top of the pipelines. Power lines were installed first, THEN pipelines. Not the other way around. The order of construction mattered 50 years ago, and it matters today.

PSE also spoke about RELIABILITY. "We have to keep the lights on." FACT: Energize Eastside will not affect reliability. PSE's own representatives (Andy Swayne) is on record stating that fact. Energize Eastside will neither decrease the frequency of outages nor the duration of outages. I urge the City to ask PSE to quantify exactly how much reliability will be improved as a result of Energize Eastside. They City owes the public that answer. I've asked. PSE's answer: ZERO increase in reliability. Yet this project will cost ratepayers over \$1BILLION dollars over the next 40 years?!

"Keeping the lights on" is a blatant scare tactic. It frightens residents. It threatens businesses by implying they will not be able to grow. It intimidates City Government by leading them to believe they won't be able to continue business development efforts. BUT IT SERIOUSLY MISREPRESENTS AND DISTORTS THE FACTS. Despite

robust growth (population and economic), electricity demand is DECLINING due to more energy efficient construction techniques, building materials, micro-generation, conservation - to name a few. Here is an example:

While it seems counterintuitive at first look, despite the BOOMING economy and growth in the region (population and economy), ELECTRICITY DEMAND is flat to declining in the region. Here's one of the many reasons why:

<https://blog.aboutamazon.com/sustainability/the-super-efficient-heat-source-hidden-below-amazons-new-headquarters>

It's not just Amazon's high rises that are following these principles. Virtually every major building project on the Eastside and in Seattle are incorporating significant energy efficiencies.

The fact that the City helps facilitate this fraudulent misrepresentation of the facts makes the City complicit in PSE's fraud - again exposing the City to significant liability. I urge the City to stick to the facts. I urge the City to hire independent experts to validate all claims by PSE - as recommended by EXPONENT in their 2012 report on Bellevue's electrical reliability.

PSE is maintaining their 3-prong media campaign to scare residents, businesses, and City Government:

1. Eastside Growth is straining the local grid
2. The "backbone" hasn't been upgraded in over 50 years
3. If we don't act soon, we will face rolling blackouts

PSE said during they meeting that they would have to begin implementing even more complex Correction Action Plans (CAPs) to keep the lights on. That certainly implies that PSE has already had to resort to CAPs because the situation is so dire. I urge the City to ask PSE exactly how many CAPs they have had to institute in the last 6 years? Dozen years? Please report that information publically. PSE has employed ZERO CAPs to-date. FACT: Bonneville Power Administration has an automated system (installed and in-use since 2007) that will prevent rolling blackouts. BPA controls this - not PSE. BPA has stated that the lights will stay on - contrary to PSE's scare tactics.

Our region's electrical grid is exactly that - A GRID. There is no longer a "backbone". Our region's transmission system resembles more of a "mesh" or a "network" not a single centralized line subject to damage by storms or natural disasters. And that transmission GRID has been upgraded multiple times in the past 20 years, including recent upgrades in 2009. It is completely false when PSE says they haven't upgraded the transmission system in 50 years. PSE is required, at a minimum, to review and analyze their system every 2 years via the Integrated Resource Planning (IRP) process. PSE makes routine transmission upgrades and improvements. If they did not, they would be delinquent in their regulated duty to provide reliable electricity to its customers. "The backbone hasn't been upgraded in over 50 years" is a good sound bite, but a false argument. Since the City hosted this meeting and heard PSE make that claim, the City has the responsibility to set the record straight. The City owes the public the truth on this point. Please show a map indicating all of the transmission upgrades that PSE has made on the Eastside in the last 20 years. If you don't have the data, I am happy to supply it.

Finally, we have all seen the Andy Wappler PSE ads stating that "If we don't act soon, we will face rolling blackouts". The City owes the public the facts on CAPs that PSE has had to implement. The City owes the

public the facts on the reliability increases we might expect from Energize Eastside. The City owes the public the facts on how much this project will REALLY cost customers in the form of higher electricity rates. What are we really getting for \$1BILLION dollars? A relic of a bygone era. There are better alternatives. Less expensive alternatives. More safe alternatives. More reliable alternatives.

The City has a responsibility to its citizens to explore and implement those alternatives.

Sincerely,

Russell Borgmann

2100 120th Place SE

Bellevue WA 98005

## Bedwell, Heidi

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**From:** Sarah Fletcher <fletchsa1@gmail.com>  
**Sent:** Sunday, December 03, 2017 9:57 AM  
**To:** info@energizeeastsideis.org  
**Subject:** Energize Eastside - Sound Transit Eastlink Light Rail Electricity Needed

Good morning, as there is no mention of how much of Eastside's electricity would be needed to run Sound Transit's East Link Light Rail, is that because Sound Transit's East Link will not be needing electricity from this Richards Creek Substation?

And you or someone at Puget Sound Energy might know,

Where is Sound Transit's East Link light rail electricity to run it coming from?

And if the electricity from Richards Creek Substation is needed, how much of it will be used for light rail and how much to run the electricity in people's homes /businesses? Perhaps, you could come out with a chart to compare the Light Rail energy use to how many houses equivalent use that works out to a day/week?

"PSE proposes to construct a new Richards Creek Substation in Bellevue and upgrade 18 miles of two existing 115-kilovolt transmission lines with 230-kilovolt lines. Collectively this proposal, which spans from Renton to Redmond, is referred to as Energize Eastside."

Thank you.

Sarah Fletcher

## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Tuesday, November 21, 2017 1:56 PM  
**To:** sean.ozel.cox@gmail.com  
**Subject:** FW: Energize Eastside permits

Hello Sean,

Your email was forwarded to my attention as I am the land use planner assigned to review the subject application. I wanted to acknowledge receipt of your comments and let you know they will be included in the city file and considered as we process the subject application. You will also be noted as a party of record and will receive notice of the permit decision, recommendation, and public hearing.

Thank you for your interest in this project and for taking the time to provide comments.

Have a Happy Thanksgiving  
-Heidi

Heidi M. Bedwell  
Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

-----Original Message-----

From: Sean Cox [mailto:[sean.ozel.cox@gmail.com](mailto:sean.ozel.cox@gmail.com)]  
Sent: Thursday, November 16, 2017 20:35  
To: LandUseReview <[LUZI@bellevuewa.gov](mailto:LUZI@bellevuewa.gov)>  
Subject: Energize Eastside permits

Sean Cox  
4538 Somerset Dr SE  
Bellevue, WA 98006

Please address how PSE can apply for permits when they haven't addressed any of the safety and risks identified by residents. They have not followed the process outlined in the states requirements for infrastructure projects and the City of Bellevue has not required them to follow the process. Until all the designs, risks, and safety issues have been addressed all permits should be denied. You can see the risks and safety items that I have submitted as part of the EIS process.

Sean Cox

Sean Cox

## Bedwell, Heidi

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Tuesday, November 14, 2017 8:22 AM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; kesayian@aol.com; llopez@mstarlabs.com  
**Subject:** RE: PSE Application/November 14 meeting  
**Attachments:** Energize Eastside and Bellevue Land Use Code.pdf; CENSE questions 11-14-17.pdf

Heidi,

CENSE has decided to skip the presentation of slides at tonight's meeting. We will submit written questions based on Bellevue's Land Use Code (attached). Since our neighbors would probably prefer not to hear all the code references in an oral presentation, we will present a shorter summary of three questions that may be of special interest to residents. I have attached a copy of that as well.

Thank you for the opportunity to provide meaningful input into the City's permit decision process.

Don Marsh

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, November 10, 2017 7:46 AM  
**To:** don.m.marsh@hotmail.com; llopez@mstarlabs.com  
**Cc:** jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Hi Don,

Yes your comments can be accommodated and we will be using a projector for the other presentations so you are welcome to have ppt slides. I appreciate your acknowledgement that the time limit would be 5 minutes. As I've noted to Loretta, the purpose of this meeting isn't necessarily to take comment like the EIS meetings but we are providing a portion of the meeting for comments. If you'd like your presentation included as part of the project file public comment please provide me with a copy of your presentation. Let me know if you have any other questions.

Thank you for your continued involvement in this process. Note that comments addressing the city's permitting criteria are most helpful at this step in the process. I've attached these code excerpts for your reference and will be providing this same information during the public meeting.

Happy Veterans Day to all!



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Don Marsh [<mailto:don.m.marsh@hotmail.com>]  
**Sent:** Friday, November 10, 2017 5:39 AM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>; [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)  
**Cc:** [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

CENSE would like to make a comment at the November 14 meeting. Our comment will be no more than five minutes long, and we would like to show some PowerPoint slides. Will this be allowed?

Don

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Wednesday, November 08, 2017 2:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 10:04 AM  
**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. 😞

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
- Staff Presentation on the Permit Process
- PSE project presentation
- General Comment
- Open House

Meeting end time 9:00 as we will need to vacate the community center by 9:30.

I, as city staff reviewing the application, will outline the permitting process, opportunities for public comment and engagement, and tips on how to provide effective timely comments. PSE will provide a brief presentation highlighting the project details. Because we are early in the permitting process we do not expect (but can imagine) people may have specific formal comments on the project. We are allowing for time for meeting attendees to provide initial comments if they have them at this point. If they'd like them formally entered into the record then comment should be in writing and include name and address. Comment forms will be provided. Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. As I've noted in the past public comments can be accepted up until staff prepares their recommendation to the hearing examiner. And then of course you can also participate in the public hearing itself. Finally, the public will have an opportunity to speak directly with city staff if they have questions about the process and to speak with PSE staff to address questions about how the project may affect their property specifically in an open house format.

This step (the public meeting) in the permitting process is meant as an introduction to the project details and process. I will be mindful as the permitting process proceeds to ensure that outcomes of the city's review, recommendation and decision are clearly communicated to effected parties. Another public meeting will be held prior to the hearing examiner's public hearing. This will be an opportunity for the public to understand the progression of the proposal- if there are any changes either made by PSE or requested by the city. Of course I am also always available to meet directly with property owners who may not want or be able to attend a public meeting or have questions specific to their property that I'm able to answer. Related to that, I noted that on the CENSE webpage you do have my name listed as a city review contact however when the email all contacts is selected the email generates david pyle's email address. Just wanted to draw that to your attention so that emails can be reach their intended audience.

I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Monday, November 06, 2017 5:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

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**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

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**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project. The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice. Would you please explain?

Thank you.

Loretta

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**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



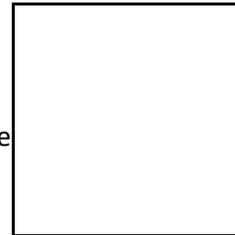
You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

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Update your subscriptions, modify your password or e-mail address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit [subscriberhelp.govdelivery.com](http://subscriberhelp.govdelivery.com).

This service is provided to you at no charge by the [City of Bellevue](#).

This email was sent to [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com) using GovDelivery Communications Cloud on behalf of: City of Bellevue Washington · 450 110th Ave NE · Bellevue, WA 98009 · 425-452-6800



▪

The City of Bellevue has land use codes that relate to the siting, safety, and alternatives for electrical infrastructure. CENSE asks the City to be diligent in following these codes as they apply to PSE's "Energize Eastside" project.

## Operational need

BLUC 20.20.255.E.3 states, "The applicant shall demonstrate that an **operational need** exists."

PSE describes the need to avoid a power outage when the following conditions occur:

1. The temperature falls below 23 degrees F.
2. Peak demand is occurring on a work day between 6-10 AM or 5-9 PM.
3. Two of the four transformers that serve the Eastside fail.
4. Regional transfers of 1,500 MW to Canada are occurring.
5. Eleven of the 20 local generation plants that serve the Eastside are offline.

To validate that this set of assumptions reasonably establishes an operational need, we ask the following questions:

Q1: How likely is it that this set of conditions will happen in the next 20 years? How many outages would be avoided if this project were built, and what would the total duration of avoided outages be?

Q2: During the past five years, how often has 1,500 MW been exported to Canada when the temperature is 23 degrees or lower in the Puget Sound region?

Q3: Can PSE show firm contracts that require the company to facilitate large energy transfers to Canada even under extreme outage conditions?

Q4: Studies performed by ColumbiaGrid and Lauckhart-Schiffman raise questions about the capacity of eleven regional transmission lines known as the "West of Cascades, North" path to serve this scenario. The path capacity is rated at 10,000 MW. What level of electricity was transmitted on this path in PSE's simulations of this scenario?

## Reliability

BLUC 20.20.255.E.4 states, "The applicant shall demonstrate that the proposed electrical utility facility **improves reliability** to the customers served and reliability of the system as a whole."

Q5: How much would Energize Eastside improve the reliability metrics SAIDI and SAIFI that PSE reports to Bellevue annually?

Q6: Which NERC reliability statute requires PSE to assume 11 local generation plants are offline during an N-1-1 outage and heavy winter demand?

## Safety

BLUC 20.20.255.G states, "The City may impose conditions relating to the location, development, design, use, or operation of an electrical utility facility to mitigate environmental, **public safety**, or other identifiable impacts."

CENSE remains concerned about the construction and operational risk of collocating extra high voltage transmission lines in the same narrow utility corridor with two half-century-old petroleum pipelines.

Q7: The Energize Eastside EIS defines risk as the likelihood of an accident multiplied by the economic and health impact of the accident. Using this definition of risk, what is the risk of a power outage in the scenario PSE has described?

Q8: What is the risk of a pipeline fire caused by a construction accident, accelerated corrosion of the pipeline, arcing of electricity from a downed power line, lightning striking a metal pole, or earthquakes? Are these risks increased by this project?

Q9: During the past 15 years, how often have transmission lines fallen in the 18-mile corridor affected by this project?

Q10: During the past 15 years, has PSE or its contractors ever caused accidental damage to a buried pipeline?

Q11: If an accident were to occur, how long would it take for the Bellevue Fire Department to extinguish the fire? What is the worst-case scenario for the community?

## Siting

BLUC 20.20.255.G states, "Where feasible, the preferred site alternative ... is located within the land use district requiring additional service and **residential land use districts are avoided** when the proposed new or expanded electrical utility facility serves a nonresidential land use district."

Q12: During the past five years, how has electricity demand grown in the residential areas that will be impacted by Energize Eastside? Is the primary need to serve growth in Bellevue's downtown core and the developing Spring District?

BLUC 20.30B.140.D stipulates, "The conditional use will not be **materially detrimental to uses or property** in the immediate vicinity of the subject property."

Q13: Are taller poles installed within striking distance of homes and any increase in the risk of catastrophic pipeline fires materially detrimental to these properties?

## Alternatives

BLUC 20.20.255.D.3 states, "Upon submittal of the Conditional Use Permit application... the applicant shall: Describe the **range of technologies considered** for the proposed electrical utility facility."

In 2015, PSE hired Strategen to study the feasibility of batteries.

Q14: Can PSE or Strategen explain precisely why a 14 MW shortfall requires a 328 MW battery?

Q15: PSE recently determined that a "flow battery" is more cost-effective than a lithium ion battery. Will PSE or Strategen update the analysis to reflect this finding?

Submitted by CENSE  
November 14, 2017

November 14, 2017

CENSE has many unanswered questions about PSE's Energize Eastside project, and we have submitted those questions in a document. During this public comment section, we would like to focus on our top three questions:

1. Is it legal for PSE to divide this project into two independently permitted and constructed sub-projects? This idea, which was proposed *after* the final comment period for the EIS, has not been adequately studied. Is it safe for the pipelines that share the corridor to operate just the southern sub-project? What happens if the northern part is not permitted? Does half the project meet PSE's original goals? If PSE wants to build two separate projects, shouldn't there be two separate Environmental Impact Studies?
2. On November 1<sup>st</sup>, Canada published a report titled "British Columbia Utilities Commission Inquiry Respecting Site C." This report states, "The Clean Energy Act requires that BC Hydro be self-sufficient for energy and capacity." This is one of three reasons that the Commission uses to explain why Canada no longer relies on electricity imported from the U.S. Given this new information, does PSE still believe it is necessary for the company to facilitate transfers of 1,500 MW to Canada?
3. According to Bellevue Land Use Code, PSE must demonstrate need to build the project. This year, the Bonneville Power Administration cancelled a billion-dollar transmission line in southwestern Washington. Canada's Site C dam project is now perilously close to being cancelled. In both of these cases, demand for electricity is lower than previously forecast. Can PSE show that electricity demand is growing in the neighborhoods impacted by Energize Eastside? More specifically, can PSE show ten years of peak demand data from the Eastgate, Somerset, and South Bellevue substations?

Don Marsh, President  
CENSE.org

## Bedwell, Heidi

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Monday, December 11, 2017 3:06 PM  
**To:** Bedwell, Heidi; kesayian@aol.com  
**Cc:** legal@cense.org  
**Subject:** RE: Comments on EE and CUP?

This is a nice clear explanation from Heidi. Normally, I would forward this to Rick with request for comment. But I want to get out of this loop except for urgent communications, so can you do it Jeanne?

I have already written drafts of our comments and submitted them to Rick for his review, but he has not responded. So I've been sitting on my hands.

Don

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Monday, December 11, 2017 3:02 PM  
**To:** kesayian@aol.com  
**Cc:** don.m.marsh@hotmail.com; legal@cense.org  
**Subject:** RE: Comments on EE and CUP?

Hi Karen,

I appreciate your concern as it relates to timing your comments. As you acknowledge there is no definite deadline in the land use code for the City to issue the Director's Recommendation. The City will accept comments at any time prior to the close of the public hearing. Therefore, even after the City issues the Director's Recommendation, interested parties will still be able to participate in the public hearing and submit comments during that process too.

However, although the City will accept comments through the public hearing, the City strongly encourages interested parties to submit comments on PSE's CUP and CALUP as early as possible. Since September when the application was submitted, the comment period on the permit applications has been open. Interested parties should submit specific comments on the CUP and CALUP now, rather than waiting until the last minute. Submitting comments now does not limit your ability to submit comments on the CUP and CALUP after the FEIS is available, but the comment periods for the EIS are closed. The active comment period concerns the CUP and CALUP, so it is important to remember that your comments should focus on PSE's permit applications.

The City's current estimate is that the Director's Recommendation and Notice of Public Hearing will be issued no sooner than approximately 6 weeks after the FEIS is available. However, I would again strongly encourage interested members of the public to submit comments on PSE's permit applications early, rather than waiting until the end of the comment period.

I hope that this additional information about the City's process addresses some of your concerns. Thank you for taking the time to participate.

-Heidi



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Karen Esayan [<mailto:kesayian@aol.com>]  
**Sent:** Friday, December 08, 2017 9:53 AM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; [legal@cense.org](mailto:legal@cense.org)  
**Subject:** Comments on EE and CUP?

Good morning Heidi,

It is generally understood that comments on the proposed PSE Energize Eastside project application for a permit can be made up until the time the staff makes their recommendation, after the FEIS is released.

My neighbors and I are still concerned about our future comments being accepted. Specifically, how many days after the FEIS is released will we have to comment. How many days (or weeks) will staff allow before they make their recommendation?

Thank you again for taking time to answer.  
Karen

Begin forwarded message:

**From:** <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Date:** November 16, 2017 at 11:27:18 AM PST  
**To:** <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Cc:** <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>, <[llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)>, <[jmedley@mac.com](mailto:jmedley@mac.com)>  
**Subject:** RE: Comments on EE and CUP?

Good morning Karen,  
Thank you for getting in touch regarding your questions. Comments provided on the Draft EIS (both Phase I and II) are included and considered as part of the Final EIS preparation. Specifically, the Final EIS will include copies of the comments that were submitted during the EIS comment periods and will also include responses to those comments. As I mentioned in my presentation at the public meeting on Tuesday evening, we are anticipating the Final EIS will be completed and available in February, 2018.

Regarding the two current permit applications under review with the City of Bellevue- comments that address PSE's Conditional Use Permit (CUP) or Critical Areas Land Use Permit (CALUP) should be submitted as part of the City's permit review land use process. This is because individuals or groups who wish to comment on PSE's permit applications will need to submit comments and contact information (i.e., your name and address) in order to be a party of record for the CUP/CALUP applications. Prior

submission of comments concerning the EIS during the EIS comment periods does not automatically make the EIS commenter a party of record regarding the City's subsequent review of PSE's specific permit applications.

Please note that the above-described land use process does not necessarily mean all comments submitted previously as part of the EIS process need to be resubmitted as part of the permit review process. In fact, the most appropriate comments during the permit review process would address PSE's specific permit applications, the current proposal, and the city codes and standards applicable to the permit applications.

Finally, I want to correct an error in the statement that Norm Hansen made during his comments at the November 14, 2017 public meeting. My contact information (including email) was in fact listed as part of the permit page and noticing information on the City's webpage. Norm appears to have overlooked this information when he made his public comment at the meeting, and I want to clear up any confusion caused by his incorrect statement regarding the availability of my contact information. As I explained at the public meeting, any comments concerning PSE's permit applications and the City's processing of those applications can be sent to me.

Hope this additional information provides you with the answers you needed. I will be working with our communications staff to add this information to our permitting page as well since I'm sure you're not the only person who may be asking the question.

Have a great day.  
-Heidi

**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Karen Esayan [<mailto:kesayan@aol.com>]

**Sent:** Thursday, November 16, 2017 7:53 AM

**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>

**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com); Janis Medley <[jpmedley@mac.com](mailto:jpmedley@mac.com)>

**Subject:** Comments on EE and CUP?

Good morning Heidi,

My question and concern is about the Energize Eastside proposal and permit application by PSE.

Specifically: commenting on the Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO)

During the comment periods for Phase I and Phase II of the EIS we were assured that our comments would all be included and reviewed in the FEIS.

Now that we are in a 'comment period' for the EE application there is confusion as to whether the comments made by Eastside residents in Phase I and Phase II will definitely be carried over and included in the current comment period.

Or.....must all residents who wish to be a party of record once again submit comments, names and addresses to be included in this process?

(These questions were not fully addressed on the City's webpages, see below)

My notes are incomplete from the 11/14 meeting as to suggested comment topics. Could you outline them?

Thank you for your work on behalf of Bellevue residents.  
Please include an email address for submitting additional comments.

Karen Esayan  
4601 135thAve SE  
Bellevue, 98006

Will my comments make any difference?

Your comments help ensure that the best decision is reached. All comments are read and carefully considered before a decision is issued. Please consider the following when commenting:

- Comments made early in the decision process are generally more effective than comments made later.
- Each application type has criteria that must be met in order to be approved. If you object to a proposal, you may want to show where you believe the applicable criteria are not met.
- You cannot appeal a decision unless you provided written comments before the decision was made.
- When a commenter provides their name and address they become a party of record. Being a party of record to a decision allows a commenter to appeal a decision.

Sent from my iPad

## Bedwell, Heidi

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Friday, November 10, 2017 5:39 AM  
**To:** Bedwell, Heidi; llopez@mstarlabs.com  
**Cc:** jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

CENSE would like to make a comment at the November 14 meeting. Our comment will be no more than five minutes long, and we would like to show some PowerPoint slides. Will this be allowed?

Don

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** llopez@mstarlabs.com  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Wednesday, November 08, 2017 2:02 PM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Wednesday, November 08, 2017 10:04 AM  
**To:** Loretta Lopez; don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. 😞

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
- Staff Presentation on the Permit Process
- PSE project presentation
- General Comment
- Open House

Meeting end time 9:00 as we will need to vacate the community center by 9:30.

I, as city staff reviewing the application, will outline the permitting process, opportunities for public comment and engagement, and tips on how to provide effective timely comments. PSE will provide a brief presentation highlighting the project details. Because we are early in the permitting process we do not expect (but can imagine) people may have specific formal comments on the project. We are allowing for time for meeting attendees to provide initial comments if they have them at this point. If they'd like them formally entered into the record then comment should be in writing and include name and address. Comment forms will be provided. Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. As I've noted in the past public comments can be accepted up until staff prepares their recommendation to the hearing examiner. And then of course you can also participate in the public hearing itself. Finally, the public will have an opportunity to speak directly with city staff if they have questions about the process and to speak with PSE staff to address questions about how the project may affect their property specifically in an open house format.

This step (the public meeting) in the permitting process is meant as an introduction to the project details and process. I will be mindful as the permitting process proceeds to ensure that outcomes of the city's review, recommendation and decision are clearly communicated to effected parties. Another public meeting will be held prior to the hearing examiner's public hearing. This will be an opportunity for the public to understand the progression of the proposal- if there are any changes either made by PSE or requested by the city. Of course I am also always available to meet directly with property owners who may not want or be able to attend a public meeting or have questions specific to their property that I'm able to answer. Related to that, I noted that on the CENSE webpage you do have my name listed as a city review contact however when the email all contacts is selected the email generates david pyle's email address. Just wanted to draw that to your attention so that emails can be reach their intended audience.

I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Monday, November 06, 2017 5:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



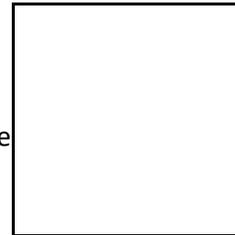
You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

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## Bedwell, Heidi

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**From:** Joan Nolan <joansn64@hotmail.com>  
**Sent:** Wednesday, November 15, 2017 2:25 PM  
**To:** Bedwell, Heidi  
**Subject:** Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

Unfortunately I was unable to attend last night's meeting on Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO) and ask any questions. So if you would, please get back to me on the following questions:

- \*Are the permit application materials final?
- \*Will new or revised information be submitted?
- \*For last night's presentation on PSE's Energize Eastside Permitting Overview slide 4 Process Overview the timeline does not provide dates. Can you provide these?

I'll look forward to hearing back from you on these items, hopefully soon. Thank you for your assistance.

Joan Nolan

## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, November 09, 2017 3:51 PM  
**To:** Bedwell, Heidi  
**Subject:** FW: PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

As I read the notice, the only people who will be notified of the public hearing before the Hearing Examiner are those who have submitted written comments on the PSE application.

It appears that unless residents submit written comments that they have no rights later. But that is not what you have set forth below under the public hearing section.

Are you sure that residents have all rights of appeal or any rights even if the residents have not submitted written comments on the PSE Application?

Thank you.

Loretta

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Thursday, November 09, 2017 3:24 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

I'm running off to another meeting. Wanted to pass along this information I'll be adding to the webpage (below). I think it answers many of your questions. It is our general practice to notice a public hearing a minimum of three weeks before the date but that is the point at which our recommendation is ready. I think Liz will be able to provide you with more input on what we can do to provide additional notice of our upcoming recommendation date. Thanks again for your communication on these issues.

There are many opportunities to participate in the City's review of the Energize Eastside project proposed by PSE. The public meeting scheduled for November 14 is an early opportunity for the public to receive information regarding the application that was recently submitted by PSE, and to get information about the Conditional Use Permit (CUP) process. It is early in the permit review process, which typically takes between 6 and 9 months. There will be many opportunities to provide formal written comment that are described more fully below. If you provided comments on the DEIS, those comments are being addressed separately through the EIS process (link to EIS page). No permits for the Energize Eastside project will be issued before the Final EIS is complete.

### At the public meeting

Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. The purpose of the meeting is to have city staff highlight the permit process and to have the applicant, Puget Sound Energy, describe the proposed project to interested parties. Because this meeting happens early in the process, city staff do not expect attendees to be prepared to provide formal comments on the project application at this point in the process. However, this public meeting does have the opportunity for comments to be provided. Note that for comments to be part of the record they should be provided in writing to city staff and include your name and address. Verbal comments that are not also provided in writing, will not be considered formal comments as part of the record. Comment forms will be provided at the meeting.

### During the permit review process

Comments are welcome throughout the review process and can be accepted up until staff prepares their recommendation to the hearing examiner. Staff will not be making a recommendation until after the FEIS has been released (anticipated for early 2018).

**At the public hearing**

And finally, you may submit comments to the city's hearing examiner during the required public hearing that will occur before a final decision is made on PSE's Conditional Use Permit application.

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Thursday, November 09, 2017 2:46 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

OK Let me know if you want me to include Liz Stead when I send message to Carol.

**1. Comments on PSE Application.** We want to inform residents about the comment period on the PSE application.

From our previous emails:

1. You have explained that we have more than 14 days from notice in permit bulletin to comment.
2. We can comment until the City issues its report.
3. The City will not issue its report until FEIS is published.
4. FEIS will be published in early 2018.
5. You do not know and cannot tell us in advance of the date that the City will issue its report.

The result is that residents do not know the deadline for submitting comments. I suppose the City's position is: The sooner the better.

A better approach is for the City to announce the publication date of the report, 30 days before publication. Is this possible? If you cannot authorize such an approach then who shall I contact?

**2. Party of record.** Based upon the notice in the Permit Bulletin, in order to appeal the decision or recommendation, residents must have submitted a comment on the PSE application. If residents do not submit a comment, then it appears that there is no right to appeal and no right to submit evidence and testimony at the administrative hearing. This is an important point so I am checking with you for a precise clarification. The notice is not precise.

Thank you.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Thursday, November 09, 2017 1:31 PM

**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

This information is posted on the webpage.

<https://development.bellevuewa.gov/cms/one.aspx?portalId=5588383&pageId=7135013&objectId.110349=10947126&contextId.110349=7135015&parentId.110349=7135016&ref=mesTP9fg96fVsgzpWYeogKPZ1qxty6m7VR6ToNGP2B4%3d>

I am working through our internal process to get more of the detail I shared with you posted but I've been in meetings all morning and haven't since the final language.

I understand your concerns. Thank you for the heads up and for the perspective. I might also have you send your message to Liz Stead as she is the new land use director [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Thursday, November 09, 2017 12:30 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I checked the link this morning and there is not yet an explanation and purpose of the meeting.

Most people who are checking for information would not know the importance of attending.

Carol Helland and I have been corresponding on the notice that the City sent to residents on the small PSE project on 148th.

Carol has asked me for suggestions on how to improve the notice process. I am going to make suggestions about what the City needs to do to improve notice about the PSE EE project.

I am sending this message to let you know before I send a message to Carol so that you know in advance,

I will be clear that I am not criticizing your work. It is the process that needs to be adjusted.

Let me know if you have any questions.

I will try to write the message to Carol later this afternoon.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** Loretta Lopez  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow. Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates/>

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Wednesday, November 08, 2017 2:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 10:04 AM  
**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. ☹️

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
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Meeting end time 9:00 as we will need to vacate the community center by 9:30.

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I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**Sent:** Monday, November 06, 2017 5:02 PM

**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>

**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>

**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

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Loretta

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**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
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Thank you.

Loretta

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Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

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Loretta

---

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**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

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**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



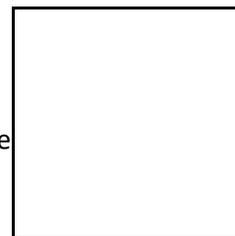
You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

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## Bedwell, Heidi

---

**From:** Kathy Judkins <kathy.judkins@gmail.com>  
**Sent:** Tuesday, November 14, 2017 12:31 PM  
**To:** Bedwell, Heidi  
**Subject:** Re: Permit comment for Energize Eastside

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you Heidi. I see that it says Project instead of President in my email ending.  
Also "against this permit" not record.  
Please note these corrections  
See you tonight  
Kathy Judkins

Sent from  
my iPhone X

On Nov 14, 2017, at 11:59 AM, <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)> <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)> wrote:

Hi Kathy,  
Thank you for your message and comments regarding the proposed PSE project. Your comments are included as part of the project file and I have you listed as a party of record. I'm happy to hear you will be attending the meeting this evening. I would encourage you to speak with PSE staff at the meeting as well to explore whether your request for a meeting with them and your neighbors can be accommodated. In any event they will be available this evening to answer questions if you have any. Thank you again and I look forward to meeting you this evening.  
-Heidi

**Heidi M. Bedwell**  
Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

-----Original Message-----

From: Kathy Judkins [<mailto:kathy.judkins@gmail.com>]  
Sent: Tuesday, November 14, 2017 11:47 AM  
To: Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
Subject: Permit comment for Energize Eastside  
Heidi

I will be at the meeting tonight. I wish to be a party of record for the EE project. I have two poles in my yard at 4324-136th Pl SE Bellevue, WA 98006. The proposed Permit states the new pole will be 80 feet tall with 230kwh lines. This will be an extreme danger to my home in the event of an earthquake or other natural disaster. The pole with that height will fall on my home or my neighbor Kelly Xu's home. We also have the Olympic Pipeline in close proximity to this pole. Also the only access to my home is on the easement drive. I am a 71 year old widow and need access to my driveway. No written details have been mailed to me by Energize the Eastside other than this

October 19 Permit Bulletin. I have refused to meet alone with EE people. I asked to have a meeting with my neighbors on the easement and PSE/EE project people but that request was not given. Please list me as a party of record as being against this record. No permit should be issued, I believe that batteries are the answer.

Thank you

Kathy Judkins

CENSE member

Former Somerset Community Association Project for 3 years Somerset resident since 1983 4324-136th

PI SE Bellevue, WA 98006-2237

Sent from

my iPhone X

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, November 09, 2017 12:30 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

I checked the link this morning and there is not yet an explanation and purpose of the meeting.

Most people who are checking for information would not know the importance of attending.

Carol Helland and I have been corresponding on the notice that the City sent to residents on the small PSE project on 148th.

Carol has asked me for suggestions on how to improve the notice process. I am going to make suggestions about what the City needs to do to improve notice about the PSE EE project.

I am sending this message to let you know before I send a message to Carol so that you know in advance,

I will be clear that I am not criticizing your work. It is the process that needs to be adjusted.

Let me know if you have any questions.

I will try to write the message to Carol later this afternoon.

Loretta

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** Loretta Lopez  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates/>

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**Sent:** Wednesday, November 08, 2017 10:04 AM

**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)

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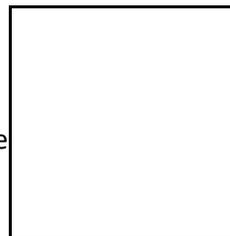
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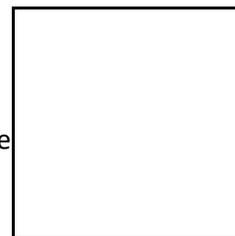
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Heidi,

Yes it is that time of year. I remember the days when my kids were young and needed to be home due to cold or flu. Thank you for your description of the public meeting. People have been asking about the meeting. And thank you for letting us know that David Pyle's email address appears. We will correct.  
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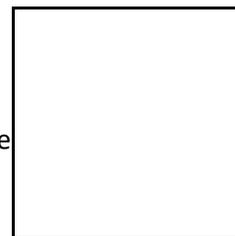
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## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Monday, November 06, 2017 5:02 PM  
**To:** Bedwell, Heidi  
**Cc:** Don Marsh; Janis Medley; Karen Esayian  
**Subject:** RE: PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below. Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [mailto:bellevuewa@public.govdelivery.com]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



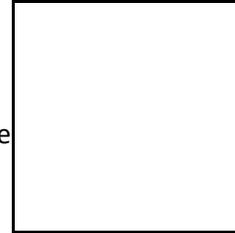
You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

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Update your subscriptions, modify your password or e-mail address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit [subscriberhelp.govdelivery.com](http://subscriberhelp.govdelivery.com).

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## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, November 09, 2017 2:46 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

OK Let me know if you want me to include Liz Stead when I send message to Carol.

**1. Comments on PSE Application.** We want to inform residents about the comment period on the PSE application.

From our previous emails:

1. You have explained that we have more than 14 days from notice in permit bulletin to comment.
2. We can comment until the City issues its report.
3. The City will not issue its report until FEIS is published.
4. FEIS will be published in early 2018.
5. You do not know and cannot tell us in advance of the date that the City will issue its report.

The result is that residents do not know the deadline for submitting comments. I suppose the City's position is: The sooner the better.

A better approach is for the City to announce the publication date of the report, 30 days before publication. Is this possible? If you cannot authorize such an approach then who shall I contact?

**2. Party of record.** Based upon the notice in the Permit Bulletin, in order to appeal the decision or recommendation, residents must have submitted a comment on the PSE application. If residents do not submit a comment, then it appears that there is no right to appeal and no right to submit evidence and testimony at the administrative hearing. This is an important point so I am checking with you for a precise clarification. The notice is not precise.

Thank you.

Loretta

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Thursday, November 09, 2017 1:31 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

This information is posted on the webpage.

<https://development.bellevuewa.gov/cms/one.aspx?portalId=5588383&pageId=7135013&objectId.110349=10947126&contextId.110349=7135015&parentId.110349=7135016&ref=mesTP9fg96fVsgzpWYeogKPZ1qxy6m7VR6ToNGP2B4%3d>

I am working through our internal process to get more of the detail I shared with you posted but I've been in meetings all morning and haven't since the final language.

I understand your concerns. Thank you for the heads up and for the perspective. I might also have you send your message to Liz Stead as she is the new land use director [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)

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**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Thursday, November 09, 2017 12:30 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I checked the link this morning and there is not yet an explanation and purpose of the meeting.

Most people who are checking for information would not know the importance of attending.

Carol Helland and I have been corresponding on the notice that the City sent to residents on the small PSE project on 148th.

Carol has asked me for suggestions on how to improve the notice process. I am going to make suggestions about what the City needs to do to improve notice about the PSE EE project.

I am sending this message to let you know before I send a message to Carol so that you know in advance,

I will be clear that I am not criticizing your work. It is the process that needs to be adjusted.

Let me know if you have any questions.

I will try to write the message to Carol later this afternoon.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]

**Sent:** Wednesday, November 08, 2017 2:38 PM

**To:** Loretta Lopez

**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)

**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates/>

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]

**Sent:** Wednesday, November 08, 2017 2:02 PM

**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>

**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)

**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]

**Sent:** Wednesday, November 08, 2017 10:04 AM

**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)

**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. ☹️

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
- Staff Presentation on the Permit Process
- PSE project presentation
- General Comment
- Open House

Meeting end time 9:00 as we will need to vacate the community center by 9:30.

I, as city staff reviewing the application, will outline the permitting process, opportunities for public comment and engagement, and tips on how to provide effective timely comments. PSE will provide a brief presentation highlighting the project details. Because we are early in the permitting process we do not expect (but can imagine) people may have specific formal comments on the project. We are allowing for time for meeting attendees to provide initial comments if they have them at this point. If they'd like them formally entered into the record then comment should be in writing and include name and address. Comment forms will be provided. Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. As I've noted in the past public comments can be accepted up until staff prepares their recommendation to the hearing examiner. And then of course you can also participate in the public hearing itself. Finally, the public will have an opportunity to speak directly with city staff if they have questions about the process and to speak with PSE staff to address questions about how the project may affect their property specifically in an open house format.

This step (the public meeting) in the permitting process is meant as an introduction to the project details and process. I will be mindful as the permitting process proceeds to ensure that outcomes of the city's review, recommendation and decision are clearly communicated to effected parties. Another public meeting will be held prior to the hearing examiner's public hearing. This will be an opportunity for the public to understand the progression of the proposal- if there are any changes either made by PSE or requested by the city. Of course I am also always available to meet directly with property owners who may not want or be able to attend a public meeting or have questions specific to their property that I'm able to answer. Related to that, I noted that on the CENSE webpage you do have my name listed as a city review contact however when the email all contacts is selected the email generates david pyle's email address. Just wanted to draw that to your attention so that emails can be reach their intended audience.

I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**Sent:** Monday, November 06, 2017 5:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

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Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
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**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>

Cc: [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)

Subject: PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez

**Sent:** Thursday, October 19, 2017 2:57 PM

**To:** 'HBedwell@bellevuewa.gov'

**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'

**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez

**Sent:** Thursday, October 19, 2017 2:48 PM

**To:** 'HBedwell@bellevuewa.gov'

**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'

**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]

**Sent:** Thursday, October 19, 2017 1:40 PM

**To:** Loretta Lopez

**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



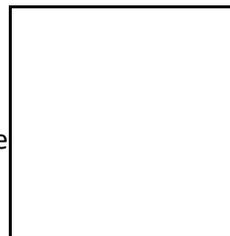
You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

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## Bedwell, Heidi

---

**From:** Bobb Nolan <webfootplants@yahoo.com>  
**Sent:** Wednesday, November 08, 2017 1:28 PM  
**To:** Bedwell, Heidi  
**Subject:** Re: RE: Energize Eastside file review

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

Thanks for your prompt response. I understand the comment period much better. I will try to get my comments in by the end of next week at the latest, is that acceptable?

I have reviewed the on-line plans, and would like to see the rest of the file. Having the plans on-line is really helpful, but I can tell there must be much more information in the project file.

Thanks so much!

Bobb

On Wednesday, November 08, 2017 01:04:08 PM PST, wrote:

Hi Bobb,

Thanks for reaching out to me and for letting me know you'd like to review the project file. Let me first clarify that the meeting next week is a public meeting not a hearing. The purpose of the meeting is for the applicant to provide an overview of the project and for city staff to provide a description of the process and opportunities for public comment. What is published in the bulletin, which unfortunately is confusing for just about everyone, is a minimum comment period. By law we can't issue a decision/recommendation on the project before the minimum comment period is over. In reality however, we never issue recommendations or decisions that quickly and in this particular case we won't be issuing anything until after the FEIS has been released. So you are correct when you note that comments will be accepted up until the staff recommendation is prepared for the hearing (TBD after the release of the FEIS early next year). Of course the earlier we receive your comments the better. I have not prepared a staff recommendation. Let me know if that clears things up a bit for you.

I can have the project files available for your review tomorrow. However, I could save you a trip if you want to review the project plans electronically. These are posted on this city webpage <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>

-Heidi



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager

Environmental Planning Manager, Land Use Division

Development Services Department

425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Bobb Nolan [mailto:webfootplants@yahoo.com]

**Sent:** Wednesday, November 08, 2017 12:37 PM

**To:** Bedwell, Heidi

**Subject:** Energize Eastside file review

Hi Heidi,

I would like to review the Energize Eastside project file tomorrow, Thursday, between 2pm and 4pm.

I am really confused when comments are due on this project - the weekly permit bulletin for October 19 says comments may be submitted up until the staff recommendation on the project is prepared for a public hearing. A staff recommendation on the project will not be issued until the FEIS is released. But the public hearing will occur after the FEIS is released.

Will comments be accepted until November 2, or until November 14 (public hearing), or until the FEIS is released?

Have you prepared a staff recommendation?

I will plan to review files tomorrow afternoon at the City Hall public records.

Thank you,

Bobb Nolan

## Bedwell, Heidi

---

**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Friday, November 10, 2017 5:39 AM  
**To:** Bedwell, Heidi; llopez@mstarlabs.com  
**Cc:** jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

CENSE would like to make a comment at the November 14 meeting. Our comment will be no more than five minutes long, and we would like to show some PowerPoint slides. Will this be allowed?

Don

---

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**To:** llopez@mstarlabs.com  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
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-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



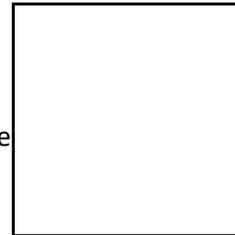
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▪

## Bedwell, Heidi

---

**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Tuesday, November 14, 2017 8:22 AM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; kesayian@aol.com; llopez@mstarlabs.com  
**Subject:** RE: PSE Application/November 14 meeting  
**Attachments:** Energize Eastside and Bellevue Land Use Code.pdf; CENSE questions 11-14-17.pdf

Heidi,

CENSE has decided to skip the presentation of slides at tonight's meeting. We will submit written questions based on Bellevue's Land Use Code (attached). Since our neighbors would probably prefer not to hear all the code references in an oral presentation, we will present a shorter summary of three questions that may be of special interest to residents. I have attached a copy of that as well.

Thank you for the opportunity to provide meaningful input into the City's permit decision process.

Don Marsh

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, November 10, 2017 7:46 AM  
**To:** don.m.marsh@hotmail.com; llopez@mstarlabs.com  
**Cc:** jpmedley@mac.com; kesayian@aol.com  
**Subject:** RE: PSE Application/November 14 meeting

Hi Don,

Yes your comments can be accommodated and we will be using a projector for the other presentations so you are welcome to have ppt slides. I appreciate your acknowledgement that the time limit would be 5 minutes. As I've noted to Loretta, the purpose of this meeting isn't necessarily to take comment like the EIS meetings but we are providing a portion of the meeting for comments. If you'd like your presentation included as part of the project file public comment please provide me with a copy of your presentation. Let me know if you have any other questions.

Thank you for your continued involvement in this process. Note that comments addressing the city's permitting criteria are most helpful at this step in the process. I've attached these code excerpts for your reference and will be providing this same information during the public meeting.

Happy Veterans Day to all!



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Don Marsh [<mailto:don.m.marsh@hotmail.com>]  
**Sent:** Friday, November 10, 2017 5:39 AM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>; [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)  
**Cc:** [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

CENSE would like to make a comment at the November 14 meeting. Our comment will be no more than five minutes long, and we would like to show some PowerPoint slides. Will this be allowed?

Don

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Wednesday, November 08, 2017 2:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 10:04 AM  
**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. 😊

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
- Staff Presentation on the Permit Process
- PSE project presentation
- General Comment
- Open House

Meeting end time 9:00 as we will need to vacate the community center by 9:30.

I, as city staff reviewing the application, will outline the permitting process, opportunities for public comment and engagement, and tips on how to provide effective timely comments. PSE will provide a brief presentation highlighting the project details. Because we are early in the permitting process we do not expect (but can imagine) people may have specific formal comments on the project. We are allowing for time for meeting attendees to provide initial comments if they have them at this point. If they'd like them formally entered into the record then comment should be in writing and include name and address. Comment forms will be provided. Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. As I've noted in the past public comments can be accepted up until staff prepares their recommendation to the hearing examiner. And then of course you can also participate in the public hearing itself. Finally, the public will have an opportunity to speak directly with city staff if they have questions about the process and to speak with PSE staff to address questions about how the project may affect their property specifically in an open house format.

This step (the public meeting) in the permitting process is meant as an introduction to the project details and process. I will be mindful as the permitting process proceeds to ensure that outcomes of the city's review, recommendation and decision are clearly communicated to effected parties. Another public meeting will be held prior to the hearing examiner's public hearing. This will be an opportunity for the public to understand the progression of the proposal- if there are any changes either made by PSE or requested by the city. Of course I am also always available to meet directly with property owners who may not want or be able to attend a public meeting or have questions specific to their property that I'm able to answer. Related to that, I noted that on the CENSE webpage you do have my name listed as a city review contact however when the email all contacts is selected the email generates david pyle's email address. Just wanted to draw that to your attention so that emails can be reach their intended audience.

I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Monday, November 06, 2017 5:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

---

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**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project. The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



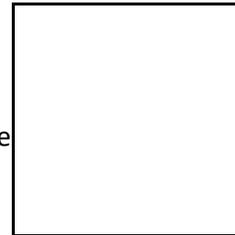
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## Bedwell, Heidi

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**From:** Joan Nolan <joansn64@hotmail.com>  
**Sent:** Wednesday, November 15, 2017 2:25 PM  
**To:** Bedwell, Heidi  
**Subject:** Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

Unfortunately I was unable to attend last night's meeting on Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO) and ask any questions. So if you would, please get back to me on the following questions:

- \*Are the permit application materials final?
- \*Will new or revised information be submitted?
- \*For last night's presentation on PSE's Energize Eastside Permitting Overview slide 4 Process Overview the timeline does not provide dates. Can you provide these?

I'll look forward to hearing back from you on these items, hopefully soon. Thank you for your assistance.

Joan Nolan

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 22, 2017 11:00 AM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** Deadlines for comments to PSE application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

Yes this information is helpful. Our understanding is that the City will issue the FEIS in early 2018.

If the City decides to issue the FEIS earlier than early 2018, then do you have authority to let us know in advance that the City has changed its timeline.

My goal is to make sure that we have clear timeline so that we can prepare our comments in a studied manner. We do not want any surprises with respect to deadlines for comments.

Thank you.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Wednesday, September 20, 2017 3:32 PM  
**To:** Loretta Lopez  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

Just running out the door here... but yes- you have up until the point staff makes their recommendation to the hearing examiner to provide me with comments. Since I can't issue the recommendation until after the FEIS is issued and that isn't scheduled until early 2018, you will have many more days than 14 to provide comment. Hope that's helpful.

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Wednesday, September 20, 2017 4:18 PM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

Hi Heidi,

I appreciate your quick response.

I am checking because I want to make sure that we know when we have to submit our response to the application. As you can imagine, it will take us some time to review the application and prepare a response.

I want to confirm that we can respond more than 14 days after notice is published in the permit bulletin. Is this correct?

Thank you.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Tuesday, September 19, 2017 1:54 PM  
**To:** Loretta Lopez  
**Cc:** jpmmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

Hi Loretta,

Thanks for checking in with me. Happy to answer questions about the permit review process.

Noticing happens after the city has determined the application is complete. I have not finished my review of the application submittal to make this determination of completeness yet. The city has up to 28 days to deem an application complete. After completeness, the city has 14 days to notice the application. I do not anticipate the notice in next week's bulletin. The application was submitted on Friday September 8<sup>th</sup>.

Hope that provides you with some guidance about where the review of the permit is at this point. Wish I could say this was the only thing on my plate at this time but as you can imagine I have to balance my general workload and the completion of the FEIS with the review of this permit. Very busy times but I'm happy to fill in some of the mystery about the steps in this particular process. Not much has happened yet as we're just a few days into the process. I know we'll be in touch again.

-Heidi

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Tuesday, September 19, 2017 2:31 PM  
**To:** Bedwell, Heidi  
**Cc:** Janis Medley ; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 9-14-17

Hi Heidi,

I did not see notice of the PSE application in last week's permit bulletin. See link below.

Is there a reason that the City has not issued notice that PSE filed an application? Is the City going to issue notice in next week's bulletin?

Thank you.

Loretta

---

**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, September 14, 2017 10:05 AM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 9-14-17



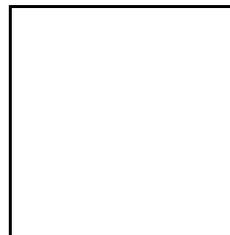
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## Bedwell, Heidi

---

**From:** whalvrsn1@frontier.com  
**Sent:** Tuesday, October 31, 2017 12:33 PM  
**To:** Bedwell, Heidi  
**Subject:** Energize Eastside - EIS & Permit Application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

Two quick questions: 1) I would like to get a complete paper copy of both phases of the EIS. I am willing to pay associated expenses and also come down to the city to pick it up. Would that be possible this week and could I just pick it up at the desk? 2) I noticed that PSE has filed their application for this project. Is there a web site to review the application and associated documents?

Thank you,

Warren Halverson

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Tuesday, September 19, 2017 2:31 PM  
**To:** Bedwell, Heidi  
**Cc:** Janis Medley; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 9-14-17

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Loretta

---

**From:** City of Bellevue [mailto:bellevuewa@public.govdelivery.com]  
**Sent:** Thursday, September 14, 2017 10:05 AM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 9-14-17



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## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, October 19, 2017 3:48 PM  
**To:** Bedwell, Heidi  
**Cc:** Janis Medley; Karen Esayian; Don Marsh  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

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Thank you.

Loretta

---

**From:** City of Bellevue [mailto:bellevuewa@public.govdelivery.com]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



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## Bedwell, Heidi

---

**From:** Don Marsh <donmarsh@cense.org>  
**Sent:** Monday, October 02, 2017 7:25 AM  
**To:** Miyake, Brad; Bedwell, Heidi; Helland, Carol; 'Steve Osguthorpe'  
**Subject:** FW: Docket UE-160918: Energize Eastside in PSE's 2017 IRP  
**Attachments:** Comments on IRP Chapter 8 - Energize Eastside.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This may be relevant to your work in connection with Energize Eastside.

Best regards,  
Don Marsh

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**From:** Don Marsh [mailto:donmarsh@cense.org]  
**Sent:** Monday, October 02, 2017 5:56 AM  
**To:** 'records@utc.wa.gov'; 'ddanner@utc.wa.gov'  
**Cc:** 'IRP -- mail --'; 'Energize Eastside -- mail --'; 'Gafken, Lisa (ATG)'; 'Council@bellevuewa.gov'; 'council@redmond.gov'; 'council@rentonwa.gov'; 'EBCC@bellevuewa.gov'; 'richc@ci.newcastle.wa.us'; 'gordonb@ci.newcastle.wa.us'; 'lindan@ci.newcastle.wa.us'; 'carols@ci.newcastle.wa.us'; 'allend@ci.newcastle.wa.us'; 'johndr@ci.newcastle.wa.us'; 'johnd@ci.newcastle.wa.us'; 'Vandana.Slatte@leg.wa.gov'; 'Kuderer.Patty@leg.wa.gov'  
**Subject:** Docket UE-160918: Energize Eastside in PSE's 2017 IRP

Dear Commissioners,

Washington is blessed with relatively low electricity rates. This is partly due to abundant hydro power in our region, but we recognize the important role the Utilities and Transportation Commission plays in ensuring that investor-owned utilities like PSE make prudent and cost-effective investments on behalf of ratepayers. The Commission reviews plans for major infrastructure projects in an "Integrated Resource Plan" published by each regulated utility on a bi-annual basis. After a project is built, the UTC reviews these expenditures in public rate case hearings.

[Chapter 8 of PSE's Draft 2017 IRP](#) focuses on transmission planning. This chapter cites the company's \$300 million transmission project known as "Energize Eastside" as an example of its transmission planning process. We applaud this effort to document an important element of resource planning. However, the Draft IRP does not answer five fundamental questions that the community has been asking about this project for years. Our questions are detailed in the attached document.

We are submitting this document under the UTC's **Docket No. UE-160918**, to PSE's IRP Advisory Group, and to the Energize Eastside team.

**In order to protect the financial interests of ratepayers and PSE (in future rate case hearings), we ask the UTC to require PSE to address these five questions with updated analysis and increased transparency in the IRP.**

We thank the Commission for your vigilance in ensuring that ratepayer funds are invested wisely in the infrastructure that provides reliable and resilient electric service to our communities and local economy.

Sincerely,

Don Marsh, President  
CENSE.org

# Energize Eastside in Draft IRP

October 2, 2017

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**Submitted by:**

Don Marsh, President, CENSE.org  
(on behalf of the CENSE executive board)

## Executive summary

Puget Sound Energy's "Energize Eastside" project proposes to double the voltage of an 18-mile transmission line that passes through four Eastside cities. The project was first announced in late 2013, but the public has never received satisfactory answers to these five questions:

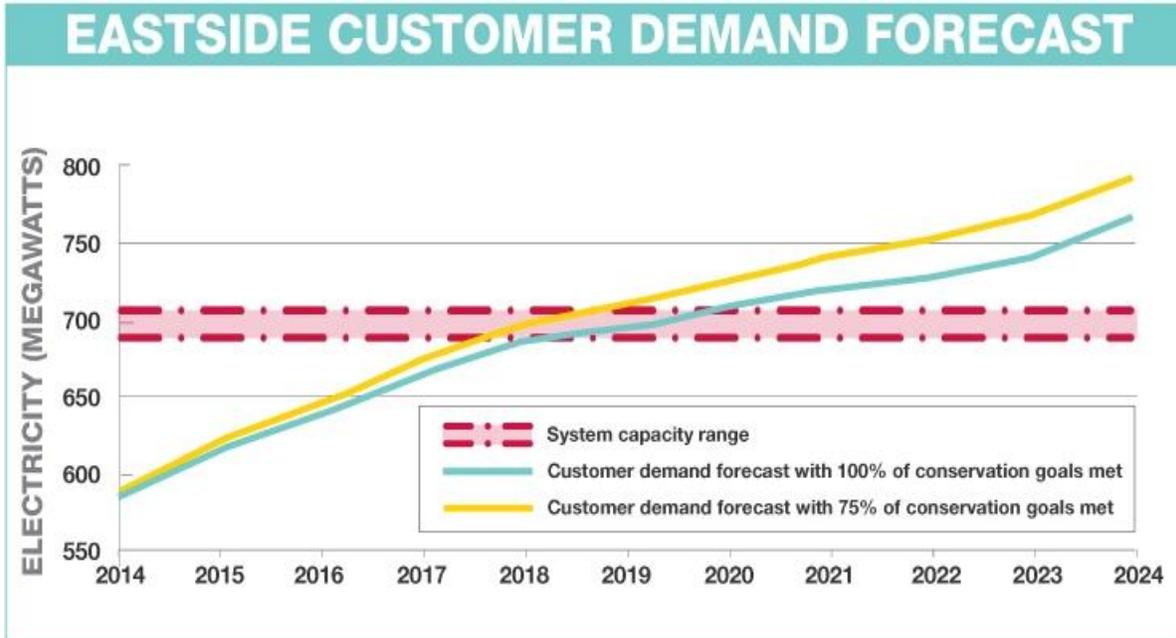
1. What justifies PSE's predicted growth of peak customer demand?
2. In which locations and customer sectors is high demand growth expected?
3. How much electricity is the state of Washington obligated to send to Canada?
4. What federal reliability standards apply to this project?
5. Can modern technologies like batteries help reduce peak demand?

The project PSE has proposed would cause many hardships for the community: increased electricity rates to cover the \$300 million construction cost, loss of thousands of mature urban trees, months of construction that would disrupt residents and businesses, and heightened risk to public safety posed by locating the extra high-voltage lines within feet of half-century old petroleum pipelines.

The community asks that the UTC require PSE to provide thorough answers to the questions listed above in PSE's 2017 IRP. The Commission and the public must be assured that Energize Eastside is a necessary and prudent use of ratepayer funds, and that no better alternative has been overlooked.

## 1. Customer demand forecast

The graph shown below was created by PSE in 2015 to illustrate the need for Energize Eastside. The graph purports to show rapidly growing demand for electricity that PSE expects to cross the “system capacity” limit sometime around 2018, increasing the risk of rolling blackouts.



The graph shows an average annual growth rate of 2.4% (assuming 100% conservation goals are achieved). But is a 2.4% annual rate of increase realistic?

According to data published by the Puget Sound Regional Council (PSRC), employment in the Puget Sound region is expected to increase from 2.2 million in 2017 to 2.7 million in 2035, an average rate of 1.0% per year.<sup>1</sup> Eastside population is projected to grow from 505,000 in 2010 to 637,000 in 2035, about 0.9% per year.<sup>2</sup> Seattle City Light’s 2016 Integrated Resource Plan predicts electricity demand will grow at less than 0.1% per year.<sup>3</sup>

Here is a summary of those forecasts:

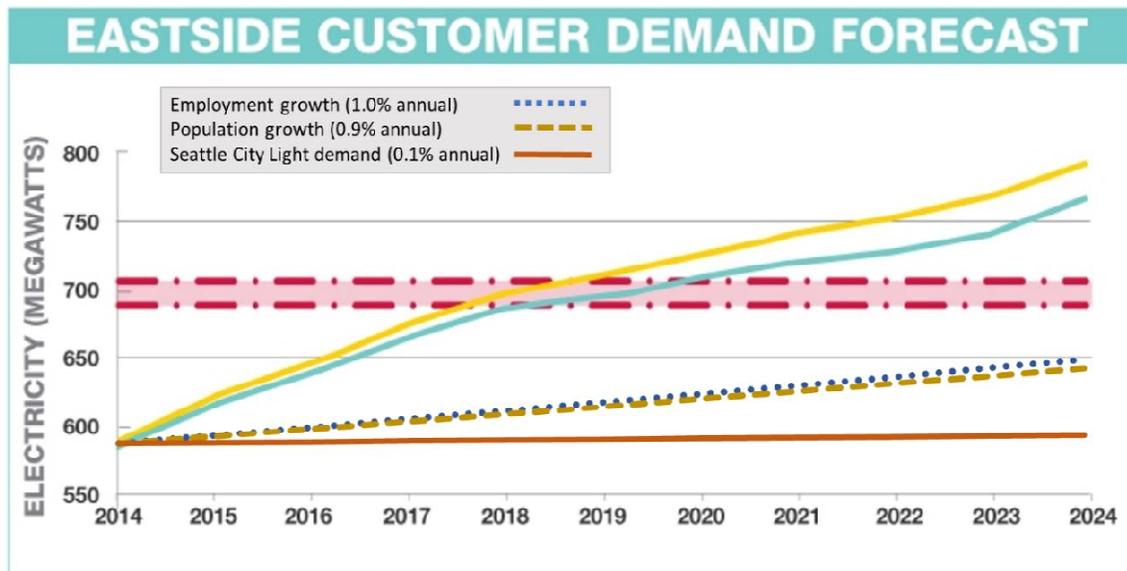
Source	Forecast	Annual change
PSRC	Puget Sound employment (2017-2035)	+1.0%
PSRC	Eastside population (2010-2035)	+0.9%
Seattle City Light	Electrical demand (2016-2035)	+0.1%

<sup>1</sup> <https://www.psrc.org/sites/default/files/2015psrc-macroeconomicforecast.xlsx>

<sup>2</sup> [https://www.psrc.org/sites/default/files/landusevision\\_v1.xlsx](https://www.psrc.org/sites/default/files/landusevision_v1.xlsx)

<sup>3</sup> <http://www.seattle.gov/light/IRP/docs/2016App-1-Load%20Forecast%20.pdf>

Adding the rates of growth forecast by the PSRC and Seattle City Light to PSE'S graph reveals a stark contrast:



Due to concerted conservation efforts enabled by advances in technology and electrical efficiency, consumption of electricity has not grown as fast as population or the economy during the last decade. The Energy Information Administration predicts national electricity consumption will grow at less than 1% annually for the next twenty years.<sup>4</sup> For the Eastside, it is reasonable to assume that the growth of population and employment provide an upper bound for the growth of electricity demand. It's likely that Seattle City Light's forecast of nearly flat growth will be matched on the Eastside.

Evidence of flat or decreasing electricity consumption is evident from sources like the 10-K forms PSE files with the SEC and Bellevue's Environmental Stewardship website.<sup>5</sup>

Just a few miles from PSE's headquarters. Seattle City Light's revenues are under pressure due to declining use of electricity:

*"This is not a phenomenon that's unique to City Light, it's a phenomenon being experienced across the country," Seattle City Light CFO Paula Laschober told a council committee recently. "Energy use peaked in 2007 and since then has been declining."*<sup>6</sup>

The Seventh Power Plan from the Northwest Power and Conservation Council says "The regional peak load for power, which typically occurs in winter, is forecast to grow from about 30,000 - 31,000 megawatts in 2015 to around 31,900-35,800 megawatts by 2035. This equates to an average annual growth rate of between 0.3 – 0.8 percent."<sup>7</sup>

<sup>4</sup> [https://www.eia.gov/outlooks/aeo/pdf/0383\(2017\).pdf](https://www.eia.gov/outlooks/aeo/pdf/0383(2017).pdf), slide 75

<sup>5</sup> <https://k4c.scopes5.com/pages/61>

<sup>6</sup> <http://mynorthwest.com/647139/seattle-city-light-lost-revenue/>

<sup>7</sup> [https://www.nwccouncil.org/media/7149937/7thplanfinal\\_chap01\\_execsummary.pdf](https://www.nwccouncil.org/media/7149937/7thplanfinal_chap01_execsummary.pdf), p. 1-4

PSE's forecast chart is based on analysis performed by Quanta Services and reported in the 2013 Eastside Needs Assessment. This study does not meet the standards required of an integrated resource plan by Washington Administrative Code 480-100-238.3:

*At a minimum, integrated resource plans must include:*

*(a) A range of forecasts of future demand using methods that examine the effect of economic forces on the consumption of electricity and that address changes in the number, type and efficiency of electrical end-uses.*

In "Section 4 Study Assumptions" of Quanta's report, sensitivity studies were run only for variations of conservation and local generation.<sup>8</sup> There is no study of economic forces or significant advances in electrical efficiency, which is a primary focus of the Seventh Power Plan.

**We ask that the UTC require PSE to explain why the company's demand forecast grows more than twice as fast as the population or economy. Why does PSE's forecast grow 25 times faster than Seattle City Light's forecast?**

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<sup>8</sup> [https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf), p. 24

## 2. Where is demand growing?

It is important to understand *where* demand is expected to grow as well as *how much* it is growing. High growth in certain areas (such as downtown Bellevue) might be served by cost-effective smart solutions such as energy storage, distributed generation, or combined heat and power. The public would benefit from a more specific solution than a one-size-fits-all transmission line.

For several years, the Energize Eastside website showed a map depicting localized demand for electricity. It seemed anomalous that Mercer Island would have the same level of demand as downtown Bellevue.

That observation prompted an engineer to ask PSE how this map was created. PSE revealed that data was combined from two extreme weather events in 2009:

- 7/29/2009: Hottest day on record (Bellevue at 106° F)
- 12/10/2009: Very cold day

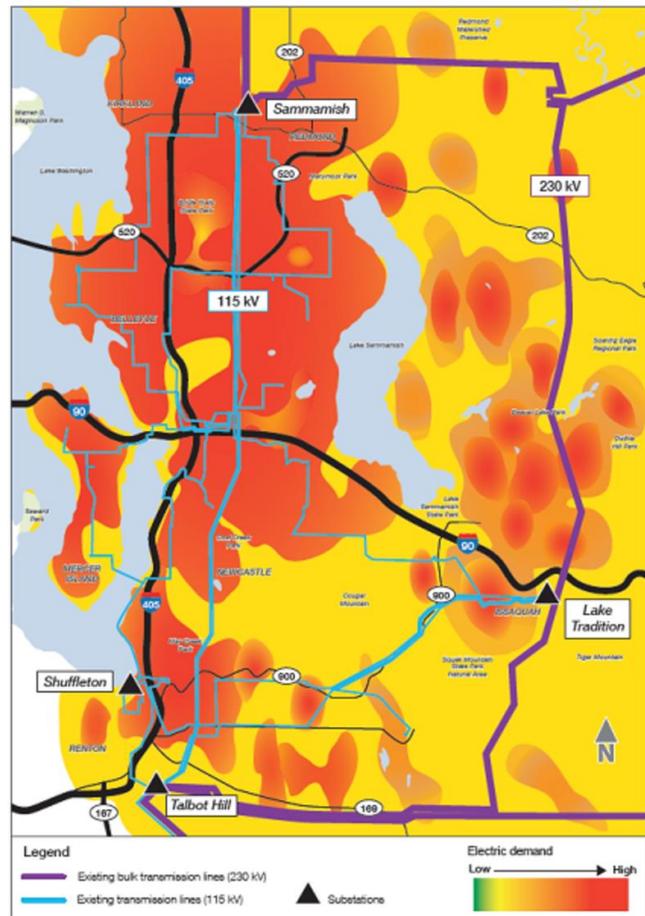
The corresponding values for electricity demand were added together, and then the results were “smeared” to “protect everyone’s privacy.”

This process destroyed any useful information the map could have provided. It simulates a scenario where Eastside residents and businesses turn on every heater and air conditioner simultaneously. That would never happen in real life.

PSE removed the map from the Energize Eastside website in October 2016. No update has been published. In any case, we would prefer a map showing expected growth. This would be more helpful for project planning than a map depicting an impossible scenario from nearly a decade ago.

**We ask that the UTC require PSE to create an up-to-date map showing where electric demand is expected to grow in the coming decade.**

The Eastside’s electric demand



### 3. How much electricity for Canada?

In 2013, PSE contracted with Quanta Services to study the need for the Energize Eastside project. These findings are described in the 2013 Eastside Needs Assessment, which lists the following “key assumptions” for the study:<sup>9</sup>

- Generation dispatch patterns reflected reasonably stressed conditions to account for generation outages as well as expected power transfers from PSE to its interconnected neighbors.
- Winter peak Northern Intertie transfers were 1,500 MW exported to Canada.

CENSE has continually questioned both assumptions, with special focus on the 1,500 MW figure. This is an enormous amount of electricity, more than twice the level consumed by the entire Eastside at its highest peak during the year.

PSE claims this requirement comes from ColumbiaGrid, the regional planning authority for the Northwest. How did ColumbiaGrid settle on this amount? It probably consulted with its members, including PSE and Seattle City Light, working with BPA. These were all parties to an agreement that aimed to boost exports to Canada in 2012.<sup>10</sup>

Whatever merits may have existed five years ago for increasing transfers to Canada, the situation has clearly changed. In September 2017, the British Columbia Utility Commission published a review of the controversial “Site C” dam project. As part of this review, it was necessary to assess the amount of electricity Canada might import through the “Canadian Entitlement” agreement in the Columbia River Treaty:

*BC Hydro states that it doesn't rely on the Columbia River Treaty Entitlement for the following reasons:*

- 1. The Clean Energy Act requires that BC Hydro be self-sufficient for energy and capacity...*
- 2. Access to the electricity markets and delivery of the Canadian Entitlement all rely upon the same I-5 transmission corridor through the Seattle region that is frequently constrained. BC Hydro has previously limited the reliance on U.S. for no more than 300-500 MW due to transmission restrictions;*
- 3. The CRT can now be terminated with 10-years notice. While notice was not given for the earliest potential termination date fiscal 2024, there is a high likelihood that negotiations between U.S. and Canada may begin this year and the Canadian Entitlement would be within the scope of negotiations. The U.S. has been seeking a reduction of power benefits to Canada.<sup>11</sup>*

Canada’s earlier reliance on 300-500 MW has been reduced, or soon will be, in accordance with British Columbia’s Clean Energy Act. The Clean Energy Act was passed in 2010, directing utilities in the province to achieve energy independence by 2016.

<sup>9</sup> [https://energizeeastside2.blob.core.windows.net/media/Default/1/library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/1/library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf), p. 8

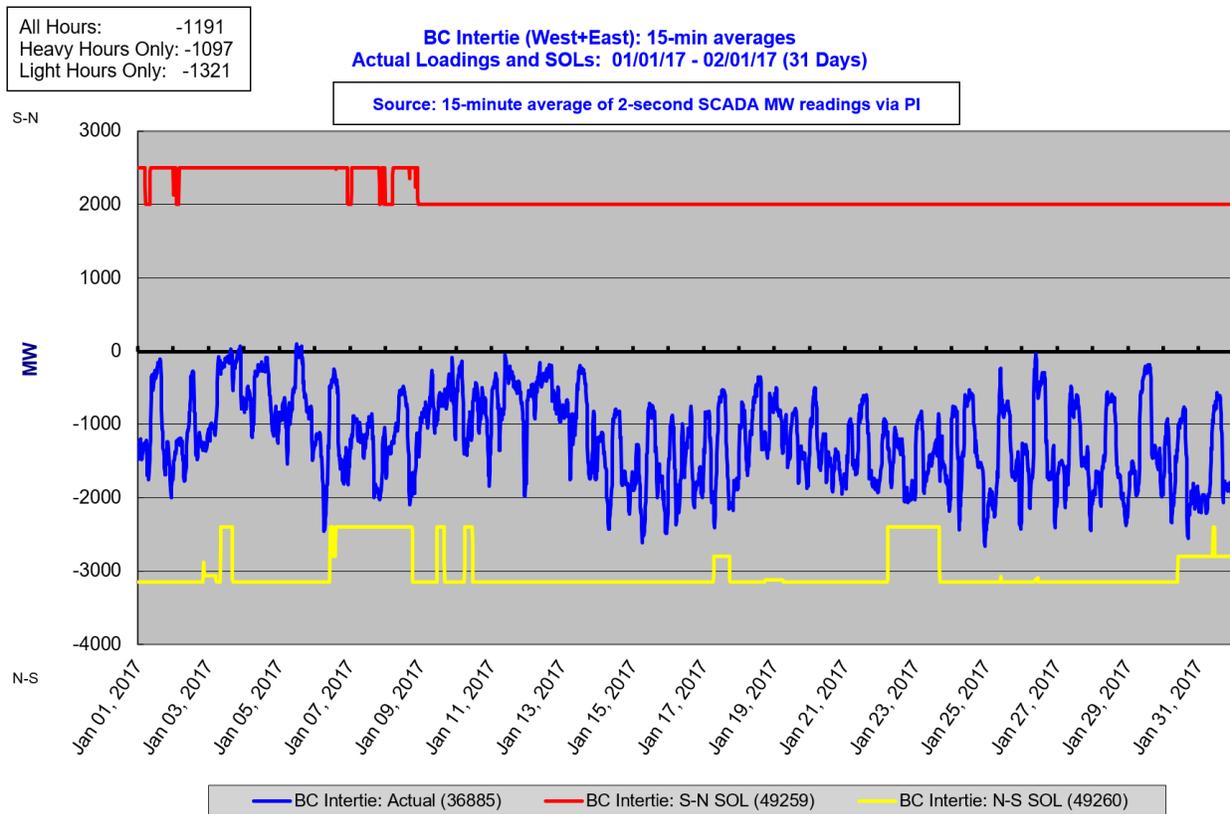
<sup>10</sup> <https://www.bpa.gov/news/newsroom/releases/Documents/20120124-PR-5-12-Joint-transmission-system-projects-to-improve-system-reliability.pdf>

<sup>11</sup> [http://www.siteinquiry.com/wp-content/uploads/2017/09/DOC\\_90185\\_A-13\\_Preliminary-Report.pdf](http://www.siteinquiry.com/wp-content/uploads/2017/09/DOC_90185_A-13_Preliminary-Report.pdf), Appendix B

The commission’s report also shows that additional infrastructure investments would be needed north of the border to support transfers of greater magnitude:

*[Increased U.S. imports] would require the construction of a new, high voltage power line (230 kV to 500 kV). Such a transmission line could cost about \$2million/km, based on BC Hydro's Northwest Transmission Line cost, so in the range of \$500 million to \$750 million.*

These expenses are not justified if Canada doesn’t need or want U.S. electricity. The actual scenario is likely to be the opposite of what PSE assumes. During cold weather in the Puget Sound, Canada would probably provide electricity to the U.S. This can be seen on a public website provided by BPA.<sup>12</sup> BPA publishes data about the flow on the Northern Intertie (aka, BC Intertie) at 15-minute intervals for the past twenty years. For example, here is a chart showing the flow that occurred during the unusually cold month of January 2017.



The wavy blue line shows power flowing from Canada to the U.S. (all values below the zero axis). For January, electricity was flowing almost exclusively south. The average southward transfer was 1191 MW. The peak occurred on January 24, when Canada supplied the U.S. with 2660 MW. Large amounts of electricity flowed south in November and December as well.

**We ask that the UTC require PSE to update its study with realistic assumptions about the flow of electricity to Canada, considering recent trends and regulatory changes in British Columbia.**

<sup>12</sup> <https://transmission.bpa.gov/Business/Operations/Paths/> (click History button next to "BC Intertie")

## 4. What are the federal standards?

A report by Bellevue’s Independent Technical Analyst, Utility System Efficiencies, explains that Energize Eastside is mandated by the Energy Policy Act of 2005. This act made mandatory NERC reliability standards that were previously voluntary.

The NERC standards are straightforward. PSE is required to avoid power outages during a peak demand scenario in which two of the most critical elements of the electric grid are out of service. In the 2013 Eastside Needs Assessment, PSE determined that those critical elements are two of the four 230kV/115kV transformers that serve the Eastside.

PSE amplified the emergency scenario by additionally assuming eleven local generation plants are offline at the same time the transformers have failed, as shown in this table from the 2013 Eastside Needs Assessment:<sup>13</sup>

Table 4-4: List of Puget Sound Area Generators Adjusted in the 2013 Eastside Needs Assessment

Generation Plant	Winter MW Rating	Expected MW Output during Winter Peak for Low-Generation Sensitivity Case	Type	Owner	Transmission Delivery Area
Enserch	184.8	125	Natural Gas, Combined Cycle	PSE	Whatcom County
Sumas	139.8	0	Natural Gas, Combined Cycle	PSE	Whatcom County
Ferndale	282.1	0	Natural Gas, Combined Cycle	PSE	Whatcom County
Whitehorn	162.2	0	Natural Gas, Simple Cycle	PSE	Whatcom County
Fredonia	341	0	Natural Gas, Simple Cycle	PSE	Skagit County
Sawmill	31	22	Biomass	Private Owner	Skagit County
Upper Baker	106	80	Hydro Dam	PSE	Skagit County
Lower Baker	78	54	Hydro Dam	PSE	Skagit County
Komo Kulshan	14	0	Hydro Run-of-River	Private Owner	Skagit County
March Point	151.6	134	Natural Gas, Combined Cycle	Shell	Skagit County
Ross	450	295	Hydro Dam	SCL	Snohomish County
Gorge	190.7	157	Hydro Dam	SCL	Snohomish County
Diablo	166	160	Hydro Dam	SCL	Snohomish County
South Tolt River	16.8	0	Hydro Run-of-River	SCL	Northeast King County
Snoqualmie	37.8	0	Hydro Run-of-River	PSE	East King County
Twin Falls	24.6	0	Hydro Run-of-River	Private Owner	East King County
Cedar Falls	30	0	Hydro Run-of-River	SCL	East King County
Freddy 1	270	0	Natural Gas, Combined Cycle	Atlantic Power/PSE	Pierce County
Electron	20	4	Hydro Run-of-River	PSE	Pierce County
Frederickson	162.2	0	Natural Gas, Simple Cycle	PSE	Pierce County

Expected MW output during Winter peak is based off of actual 2011-2012 Winter peak output except for SCL hydro, which is based off of modeled generation levels in WECC winter peak case.

In total, PSE assumes 1,827 MW of generation capacity will not be available during peak winter demand, the scenario these local generators were meant to serve. With this extreme assumption, PSE’s remaining transformers would overload. The contrived overloads are used to justify Energize Eastside.

Is this reduced generation scenario required by NERC reliability standards? This question arose in an “informational” study described in ColumbiaGrid’s 2013 System Assessment. ColumbiaGrid’s

<sup>13</sup> [https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf), p. 32

assumptions are similar to PSE's (heavy exports to Canada and low generation in western Washington):

*The Northwest to British Columbia transfer was **increased to 1500 MW** and the West of Cascades North transfer was increased to near its limit (10,200 MW) by **reducing local west side gas generation**. This case is being studied for information purposes and mitigation is not required as **it goes beyond what is required in the NERC Reliability Standards**.<sup>14</sup>*

PSE must follow NERC standards or explain why it is prudent to exceed them.

**We ask that the UTC require PSE to update its study with all local generation running.**

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<sup>14</sup> <http://columbiagrid.org/books/pdf/2013SA-FB.pdf>, p. 12

## 5. Can batteries help?

Battery technology has advanced rapidly since PSE announced Energize Eastside. In 2014, PSE hired E3 to determine if non-wire solutions were a feasible alternative to upgrading the transmission line. E3's report contained no mention of batteries.

E3's goal was to find 70 MW of savings by 2021. If successful, the project could be deferred until 2021, saving ratepayers \$40 million (according to E3's analysis). However, E3 found only 56 MW of cost-effective savings, 14 MW short of the target.

By 2015, PSE recognized that batteries might be useful in filling that 14 MW gap. PSE engaged Strategen to work out the details. Strategen found that only the biggest battery in the world (328 MW) could cover the 14 MW shortfall. CENSE argues that unrealistic criteria and outdated assumptions led Strategen to this questionable conclusion.

For example, conservation has been more effective than PSE originally assumed. In October 2016, PSE included flyers in customers' bills congratulating everyone for saving 7% more electricity than PSE anticipated. This higher rate of conservation could cut the E3 deficit to 7 MW instead of 14 MW. If a battery must be five times bigger than the need, as Strategen explains in its report, the Eastside would need a 35 MW battery in 2021. That is not a big battery by today's standards, and may be considered tiny by 2021.

PSE acknowledges that batteries are attractive because they can be added incrementally as demand rises. A small battery can address any near-term need for a fraction of the price of Energize Eastside. Deferring additional battery purchases until they are needed would reduce the average cost due to the rapidly declining price of batteries. A battery purchased a few years from now may cost half as much as it would today.

In addition to saving money, batteries increase year-round reliability and store off-peak wind and solar energy, thereby reducing carbon emissions.

CENSE is especially interested in a vanadium flow battery manufactured by UniEnergy Technologies, located in Mukilteo. These batteries do not degrade over thousands of charging cycles as lithium ion batteries do, they are totally non-flammable, and PSE has determined they are cost-effective. Sustainability is also important, and vanadium can be extracted from waste products like coal ash and mine tailings without harming the environment. If UniEnergy were to supply a favorable bid, we would have the opportunity to support local jobs and invest in our local economy.

**We ask that the UTC require PSE to revisit the analysis provided by E3 and Strategen using updated assumptions about load growth and conservation, Canadian exports, fully utilized local generation, and modern battery specifications.**

## 6. Conclusion

The data and assumptions PSE used to justify Energize Eastside are no longer valid.

- PSE's demand forecast wasn't credible in 2013 and is even less believable now.
- PSE does not show where pockets of growth may occur in the future.
- Exports to Canada are declining or reversing direction.
- PSE's assumptions about local generation exceed NERC reliability standards.
- Batteries can be smaller and more feasible than Strategen found in 2015.

CENSE has raised these issues with PSE for months or years and has not received satisfactory answers.

Seattle City Light and BPA are experiencing lower than expected demand for electricity. Seattle is suffering revenue shortfalls, and BPA is canceling long-planned projects:

*The Bonneville Power Administration has canceled a costly and controversial transmission line that would have run 80 miles from Troutdale through southwest Washington. Experts decided the project would have increased the reliability of electricity but would have added far more capacity than the region needed. To manage congestion, Mainzer said BPA is looking at battery storage, reducing demand from big customers and managing generation more effectively during periods of peak demand.<sup>15</sup>*

Given new technology and reduced demand, BPA decided to save its ratepayers hundreds of millions of dollars using solutions other than a controversial transmission line. PSE should do the same.

**Ratepayers ask that the UTC compel PSE to address these significant changes in its IRP, ensuring that Energize Eastside is a prudent investment based on solid facts and up-to-date information.**

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<sup>15</sup> [http://www.oregonlive.com/business/index.ssf/2017/05/bpa\\_nixes\\_costly\\_and\\_controver.html](http://www.oregonlive.com/business/index.ssf/2017/05/bpa_nixes_costly_and_controver.html)

## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, November 09, 2017 3:51 PM  
**To:** Bedwell, Heidi  
**Subject:** FW: PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

As I read the notice, the only people who will be notified of the public hearing before the Hearing Examiner are those who have submitted written comments on the PSE application.

It appears that unless residents submit written comments that they have no rights later. But that is not what you have set forth below under the public hearing section.

Are you sure that residents have all rights of appeal or any rights even if the residents have not submitted written comments on the PSE Application?

Thank you.

Loretta

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**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Thursday, November 09, 2017 3:24 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

I'm running off to another meeting. Wanted to pass along this information I'll be adding to the webpage (below). I think it answers many of your questions. It is our general practice to notice a public hearing a minimum of three weeks before the date but that is the point at which our recommendation is ready. I think Liz will be able to provide you with more input on what we can do to provide additional notice of our upcoming recommendation date. Thanks again for your communication on these issues.

There are many opportunities to participate in the City's review of the Energize Eastside project proposed by PSE. The public meeting scheduled for November 14 is an early opportunity for the public to receive information regarding the application that was recently submitted by PSE, and to get information about the Conditional Use Permit (CUP) process. It is early in the permit review process, which typically takes between 6 and 9 months. There will be many opportunities to provide formal written comment that are described more fully below. If you provided comments on the DEIS, those comments are being addressed separately through the EIS process (link to EIS page). No permits for the Energize Eastside project will be issued before the Final EIS is complete.

### At the public meeting

Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. The purpose of the meeting is to have city staff highlight the permit process and to have the applicant, Puget Sound Energy, describe the proposed project to interested parties. Because this meeting happens early in the process, city staff do not expect attendees to be prepared to provide formal comments on the project application at this point in the process. However, this public meeting does have the opportunity for comments to be provided. Note that for comments to be part of the record they should be provided in writing to city staff and include your name and address. Verbal comments that are not also provided in writing, will not be considered formal comments as part of the record. Comment forms will be provided at the meeting.

### During the permit review process

Comments are welcome throughout the review process and can be accepted up until staff prepares their recommendation to the hearing examiner. Staff will not be making a recommendation until after the FEIS has been released (anticipated for early 2018).

**At the public hearing**

And finally, you may submit comments to the city's hearing examiner during the required public hearing that will occur before a final decision is made on PSE's Conditional Use Permit application.

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**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Thursday, November 09, 2017 2:46 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

OK Let me know if you want me to include Liz Stead when I send message to Carol.

**1. Comments on PSE Application.** We want to inform residents about the comment period on the PSE application.

From our previous emails:

1. You have explained that we have more than 14 days from notice in permit bulletin to comment.
2. We can comment until the City issues its report.
3. The City will not issue its report until FEIS is published.
4. FEIS will be published in early 2018.
5. You do not know and cannot tell us in advance of the date that the City will issue its report.

The result is that residents do not know the deadline for submitting comments. I suppose the City's position is: The sooner the better.

A better approach is for the City to announce the publication date of the report, 30 days before publication. Is this possible? If you cannot authorize such an approach then who shall I contact?

**2. Party of record.** Based upon the notice in the Permit Bulletin, in order to appeal the decision or recommendation, residents must have submitted a comment on the PSE application. If residents do not submit a comment, then it appears that there is no right to appeal and no right to submit evidence and testimony at the administrative hearing. This is an important point so I am checking with you for a precise clarification. The notice is not precise.

Thank you.

Loretta

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Thursday, November 09, 2017 1:31 PM

**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

This information is posted on the webpage.

<https://development.bellevuewa.gov/cms/one.aspx?portalId=5588383&pageId=7135013&objectId.110349=10947126&contextId.110349=7135015&parentId.110349=7135016&ref=mesTP9fg96fVsgzpWYeogKPZ1qxty6m7VR6ToNGP2B4%3d>

I am working through our internal process to get more of the detail I shared with you posted but I've been in meetings all morning and haven't since the final language.

I understand your concerns. Thank you for the heads up and for the perspective. I might also have you send your message to Liz Stead as she is the new land use director [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Thursday, November 09, 2017 12:30 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I checked the link this morning and there is not yet an explanation and purpose of the meeting.

Most people who are checking for information would not know the importance of attending.

Carol Helland and I have been corresponding on the notice that the City sent to residents on the small PSE project on 148th.

Carol has asked me for suggestions on how to improve the notice process. I am going to make suggestions about what the City needs to do to improve notice about the PSE EE project.

I am sending this message to let you know before I send a message to Carol so that you know in advance,

I will be clear that I am not criticizing your work. It is the process that needs to be adjusted.

Let me know if you have any questions.

I will try to write the message to Carol later this afternoon.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 2:38 PM  
**To:** Loretta Lopez  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Good question. I should have mentioned that this information would be available on the webpage I referenced below. My PIO staff is already working on it. 😊 I'm happy to work on something that you could use separately for your webpage as well. I'll try to get you something first tomorrow. Running off to another meeting here now.

Looks like the link I sent may not be working . Here it is again <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates/>

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Wednesday, November 08, 2017 2:02 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Heidi,

Would you post this information on City website so that public will know more details.

We would like post the information on CENSE website. Do you want to rewrite parts of it?

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Wednesday, November 08, 2017 10:04 AM  
**To:** Loretta Lopez; [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** RE: PSE Application/November 14 meeting

Hi Loretta,

Back in the office today after tending to a sick kid-that time of year already. ☹️

Thanks for checking back in again. Property owners adjacent to the corridor and properties within 500 feet of the corridor were provided notice of the application and the public meeting. The meeting will be similar to other public meetings for permit applications in that the primary purpose is for the applicant (PSE) to provide an overview of their project.

The general agenda is as follows:

Meeting start time 6:30

- Welcome, Description of Meeting Objective and Basic Meeting Guidelines
- Staff Presentation on the Permit Process
- PSE project presentation
- General Comment
- Open House

Meeting end time 9:00 as we will need to vacate the community center by 9:30.

I, as city staff reviewing the application, will outline the permitting process, opportunities for public comment and engagement, and tips on how to provide effective timely comments. PSE will provide a brief presentation highlighting the project details. Because we are early in the permitting process we do not expect (but can imagine) people may have specific formal comments on the project. We are allowing for time for meeting attendees to provide initial comments if they have them at this point. If they'd like them formally entered into the record then comment should be in writing and include name and address. Comment forms will be provided. Unlike the EIS meetings, the primary purpose of this meeting is not to take public comment. As I've noted in the past public comments can be accepted up until staff prepares their recommendation to the hearing examiner. And then of course you can also participate in the public hearing itself. Finally, the public will have an opportunity to speak directly with city staff if they have questions about the process and to speak with PSE staff to address questions about how the project may affect their property specifically in an open house format.

This step (the public meeting) in the permitting process is meant as an introduction to the project details and process. I will be mindful as the permitting process proceeds to ensure that outcomes of the city's review, recommendation and decision are clearly communicated to effected parties. Another public meeting will be held prior to the hearing examiner's public hearing. This will be an opportunity for the public to understand the progression of the proposal- if there are any changes either made by PSE or requested by the city. Of course I am also always available to meet directly with property owners who may not want or be able to attend a public meeting or have questions specific to their property that I'm able to answer. Related to that, I noted that on the CENSE webpage you do have my name listed as a city review contact however when the email all contacts is selected the email generates david pyle's email address. Just wanted to draw that to your attention so that emails can be reach their intended audience.

I hope that as members of CENSE you will pass on any meeting information you see relevant to your members. I do appreciate your continued involvement in the process to evaluate PSE's Energize Eastside project. Your input has been helpful in understanding the community interests and has shaped our understanding of the proposal.

-Heidi

For more information see [Energize Eastside Updates](#)



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department

425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]

**Sent:** Monday, November 06, 2017 5:02 PM

**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>

**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>; Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>

**Subject:** RE: PSE Application/November 14 meeting

Heidi,

I am checking on the November 14 meeting.

As you stated below you would have more details about the meeting as we got to closer to the date. See message below.

Are there any additional details or is this meeting going to consist of the standard format in which the applicant presents an overview of the project to citizens.

Also, did the city notify all residents who live along the proposed route of the meeting? Did the notice include any description of the consequences of the permit if granted?

The reason that I ask is that I have been watching the 148 project. I attended the eminent domain meeting required by RCW. The residents clearly did not know that one of the consequences of the 148th project is that PSE would initiate condemnation proceedings against their property.

We want to avoid this type of miscommunication on this project.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com); [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com)  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [<mailto:bellevuewa@public.govdelivery.com>]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



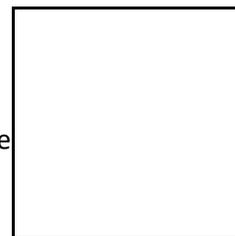
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## Bedwell, Heidi

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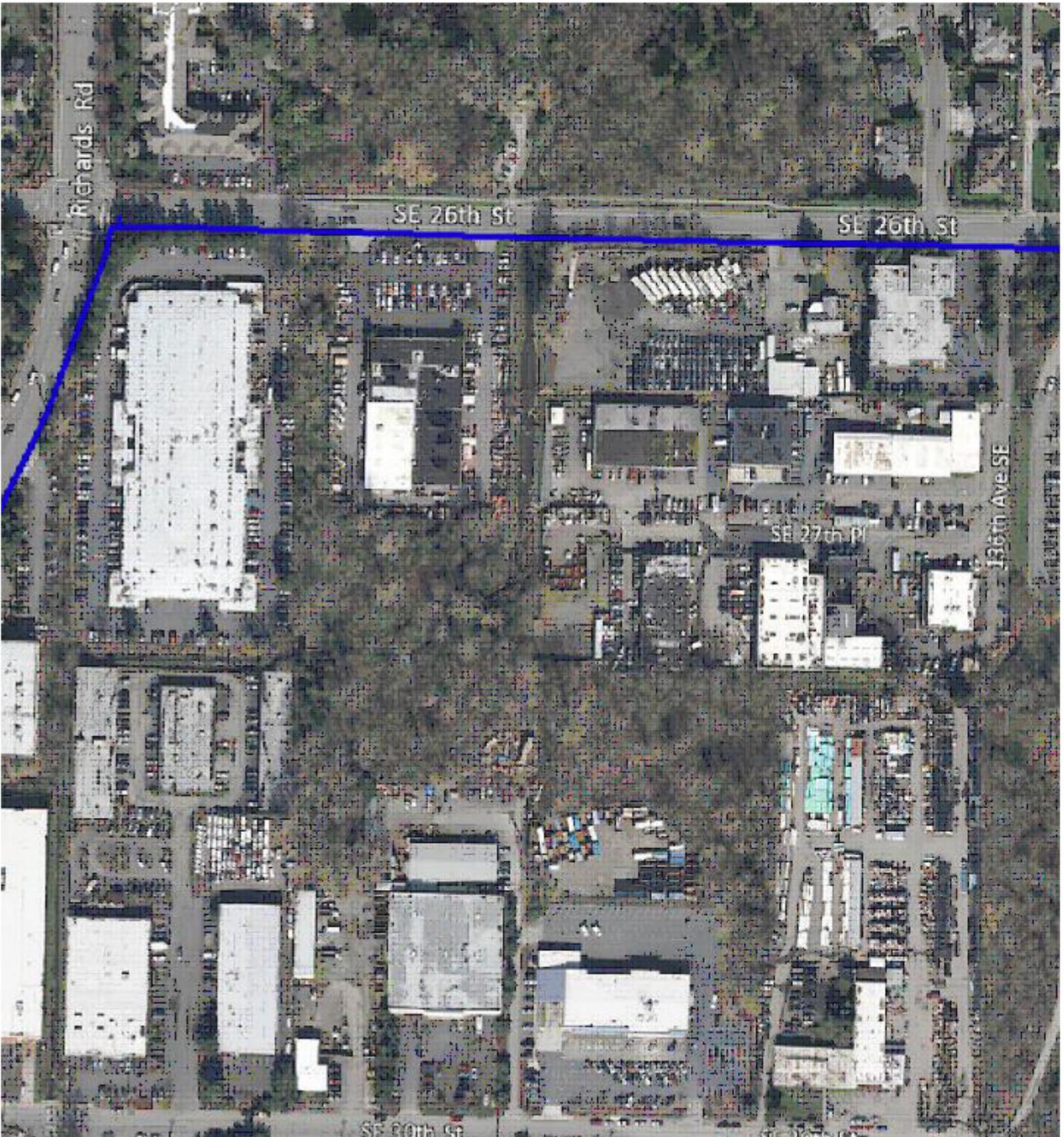
**From:** Hallauer, Teri <Teri.Hallauer@seattle.gov>  
**Sent:** Thursday, October 19, 2017 4:24 PM  
**To:** Bedwell, Heidi  
**Cc:** Brennan, Michael  
**Subject:** Notice of Application - Energize Eastside - New PSE Substation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

*Heidi,*

*The City of Seattle (Seattle Public Utilities) owns and operates a 36 inch concrete cased water transmission line that runs east and west immediately adjacent to the parcel where the newly proposed PSE substation will be located. Please be sure that Michael Brennan from Seattle Public Utilities is included in the review process to insure the both the safety of our water line and the public's safety. Michael's number is 206-684-5921 and his email address is:*

*[michael.brennan@seattle.gov](mailto:michael.brennan@seattle.gov) .*



*Teri Hallauer  
Senior Real Property Agent  
Seattle Public Utilities  
206-684-5971  
teri.hallauer@seattle.gov*

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 08, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE 18 mile project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,  
PSE has announced that it intends to file a application soon. The FEIS is not going to be ready until 1st quarter 2018.  
Does the City intend to issue a permit decision before the FEIS is published in 2018?  
Or has the City changed the date of issuance of FEIS?  
Thank you.  
Loretta

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,  
You may not have had time to respond to my message below.  
No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.  
Thank you.  
Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,  
One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting? Will there be opportunity for residents to ask questions? Will the EIS consultant be present to listen to questions?  
Thank you.  
Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,  
I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?  
Thank you.  
Loretta

---

**From:** City of Bellevue [mailto:bellevuewa@public.govdelivery.com]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



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## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 08, 2017 3:42 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE Project/ Danger Zone tree cutting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

We have had some questions from residents in Bridle Trails about PSE plans regarding the Danger Zone area. The Danger Zone area is outside of the easement.

Since the trees in BT are tall, in some cases there are trees outside of easement but in area that PSA has designated as Danger Zone.

Will trees in the Danger Zone be cut?

Thank you.

Loretta

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 22, 2017 11:54 AM  
**To:** whalvrsn1@frontier.com; Bedwell, Heidi  
**Cc:** jpmedley@mac.com; Hansennp@aol.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Warren,

Yes the City has a big advantage in crafting a response to the application and the EIS simultaneously. Once again we are at a disadvantage.

We will figure out a plan.

Loretta

-----Original Message-----

From: whalvrsn1@frontier.com [mailto:whalvrsn1@frontier.com]  
Sent: Thursday, September 21, 2017 4:18 AM  
To: Loretta Lopez; HBedwell@bellevuewa.gov  
Cc: jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
Subject: RE: City of Bellevue Weekly Permit Bulletin 9-14-17

Hi Loretta:

Thanks again for keeping on this: My most recent "Ah Ha" is: Isn't it interesting that the staff is working on the application simultaneously with the EIS. How convenient for PSE!!

We need to find a term for those folks on the city staff who work for PSE and likewise those in PSE who work for the city i.e. Bellevue/PSE staff or BP staff .... Oh boy, my creativity is lacking .... Jan??

You got to give it to PSE and their hated consultants, they do have their strategy and action plan set and being implemented.

Warren

-----  
On Wed, 9/20/17, <HBedwell@bellevuewa.gov> wrote:

Subject: RE: City of Bellevue Weekly Permit Bulletin 9-14-17  
To: llopez@mstarlabs.com  
Cc: jpmedley@mac.com, Hansennp@aol.com, whalvrsn1@frontier.com  
Date: Wednesday, September 20, 2017, 4:31 PM

City of Bellevue  
Weekly Permit Bulletin 9-14-17#yiv6618793902  
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Just running out the door here...  
but yes- you have up until the point staff makes their recommendation to the hearing examiner to provide me with comments. Since I can't issue the recommendation until after the FEIS is issued and that isn't scheduled until early 2018, you will have many more days than 14 to provide comment. Hope that's helpful.

From: Loretta Lopez  
[mailto:llopez@mstarlabs.com]

Sent: Wednesday, September 20, 2017 4:18 PM

To: Bedwell, Heidi <HBedwell@bellevuewa.gov>

Cc: jpmmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com

Subject: RE: City of Bellevue Weekly Permit Bulletin  
9-14-17

Hi Heidi,

I appreciate your quick response.

I am checking because I want to make sure that we know when we have to submit our response to the application. As you can imagine, it will take us some time to review the application and prepare a response.

I want to confirm that we can respond more than 14 days after notice is published in the permit bulletin. Is this correct?

Thank you.

Loretta

From: HBedwell@bellevuewa.gov  
[mailto:HBedwell@bellevuewa.gov]

Sent: Tuesday, September 19, 2017 1:54 PM

To: Loretta Lopez

Cc: jpmmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com

Subject: RE: City of Bellevue Weekly Permit Bulletin  
9-14-17

Hi Loretta,  
Thanks for checking in with me.  
Happy to answer questions about the permit review process.

Noticing happens after the city has determined the application is complete. I have not finished my review of the application submittal to make this determination of completeness yet. The city has up to 28 days to deem an application complete. After completeness, the city has

14 days to notice the application. I do not anticipate the notice in next week's bulletin. The application was submitted on Friday September 8th.

Hope that provides you with some guidance about where the review of the permit is at this point. Wish I could say this was the only thing on my plate at this time

but as you can imagine I have to balance my general workload and the completion of the FEIS with the review of this permit. Very busy times but I'm happy to fill in some of the mystery about the steps in this particular process. Not much has happened yet

as we're just a few days into the process. I know we'll be in touch again.

-Heidi

From: Loretta Lopez  
[mailto:llopez@mstarlabs.com]

Sent: Tuesday, September 19, 2017 2:31 PM

To: Bedwell, Heidi <HBedwell@bellevuewa.gov>

Cc: Janis Medley <jpmedley@mac.com>;  
Hansennp@aol.com; whalvrsn1@frontier.com

Subject: FW: City of Bellevue Weekly Permit Bulletin  
9-14-17

Hi Heidi,

I did not see notice of the PSE application in last week's permit bulletin. See link below.

Is there a reason that the City has not issued notice that PSE filed an application? Is the City going to issue notice in next week's bulletin?

Thank you.

Loretta

From: City of Bellevue [mailto:bellevuewa@public.govdelivery.com]

Sent: Thursday, September 14, 2017 10:05 AM

To: Loretta Lopez

Subject: City of Bellevue Weekly Permit Bulletin  
9-14-17

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## Bedwell, Heidi

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**To:** llopez@mstarlabs.com; Bedwell, Heidi  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

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#yiv6618793902 --

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[mailto:HBedwell@bellevuewa.gov]

Sent: Tuesday, September 19, 2017 1:54 PM

To: Loretta Lopez

Cc: jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com

Subject: RE: City of Bellevue Weekly Permit Bulletin  
9-14-17

Hi Loretta,  
Thanks for checking in with me.  
Happy to answer questions about the permit review process.

Noticing happens after the city has determined the application is complete. I have not finished my review of the application submittal to make this determination of completeness yet. The city has up to 28 days to deem an application complete. After completeness, the city has 14 days to notice the application. I do not anticipate the notice in next week's bulletin. The application was submitted on Friday September 8th.

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-Heidi

From: Loretta Lopez  
[mailto:llopez@mstarlabs.com]

Sent: Tuesday, September 19, 2017 2:31 PM

To: Bedwell, Heidi <HBedwell@bellevuewa.gov>

Cc: Janis Medley <jpmedley@mac.com>;  
Hansennp@aol.com; whalvrsn1@frontier.com

Subject: FW: City of Bellevue Weekly Permit Bulletin  
9-14-17

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application in last week's permit bulletin. See link below.

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has not issued notice that PSE filed an application? Is the City going to issue notice in next week's bulletin?

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Loretta

From: City of Bellevue [mailto:bellevuewa@public.govdelivery.com]

Sent: Thursday, September 14, 2017 10:05 AM

To: Loretta Lopez

Subject: City of Bellevue Weekly Permit Bulletin  
9-14-17

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## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Wednesday, September 20, 2017 4:18 PM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

I appreciate your quick response.

I am checking because I want to make sure that we know when we have to submit our response to the application. As you can imagine, it will take us some time to review the application and prepare a response.

I want to confirm that we can respond more than 14 days after notice is published in the permit bulletin. Is this correct?

Thank you.

Loretta

---

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**Sent:** Tuesday, September 19, 2017 1:54 PM  
**To:** Loretta Lopez  
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## Bedwell, Heidi

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**Cc:** 'jpmmedley@mac.com'; 'Hansennp@aol.com'; 'whalvrsn1@frontier.com'  
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## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, October 12, 2017 4:16 PM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 9-14-17

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

As you stated in your message below the City has up to 28 days to deem the PSE application complete. Has the City determined that the PSE application is complete?

Thank you.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Tuesday, September 19, 2017 1:54 PM  
**To:** Loretta Lopez  
**Cc:** jpmedley@mac.com; Hansennp@aol.com; whalvrsn1@frontier.com  
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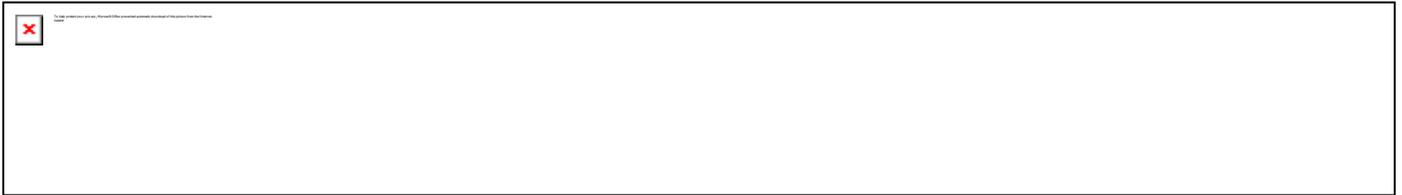
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## Bedwell, Heidi

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, October 20, 2017 3:20 PM  
**To:** Bedwell, Heidi  
**Cc:** jpmedley@mac.com; kesayian@aol.com; don.m.marsh@hotmail.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

I have regarded the City's response to PSE application as the City's "decision."

Thank you for clarifying that the Director issues a recommendation, not a "decision".

Parties then must request appeal of the recommendation to invoke the decision making process of the Hearing Examiner.

Thank you.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, October 20, 2017 12:58 PM  
**To:** Loretta Lopez  
**Cc:** jpmedley@mac.com; kesayian@aol.com; don.m.marsh@hotmail.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Not exactly- let me try to provide some additional clarity and information:

I have included the entire code section on Process I decisions for your reference and more detail. This process is applicable to the Conditional Use Permit. The Director prepares a recommendation not a decision. The hearing examiner makes a decision after holding a public hearing to hear public testimony and to consider the Director's recommendation. Once the hearing examiner has made a decision, it is their decision that is appealable to the city council. As staff, I draft the director's recommendation for the director's review. But it is a director's recommendation to the hearing examiner. And a hearing examiner decision that is appealable to the city council.

The proposal also requires a critical areas land use permit which is a process II decision. I have also provided this code excerpt attached. The difference with a process II application is that the Director makes a decision and that decision is appealable to the hearing examiner. The hearing examiner will hear the appeal of a process II decision at the same time it considers the Director's recommendation on a process I application. And the hearing examiner makes a decision on the process II application appeal.

Appeal of both final decisions (city council and hearing examiner's decision) is to Superior Court.

I think I covered everything but if not, please refer to the specific code sections attached for the required process. I trust this additional clarification helps. Hope everyone has a nice weekend!

-Heidi



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**Sent:** Friday, October 20, 2017 2:13 PM

**To:** Bedwell, Heidi

**Cc:** jpmmedley@mac.com; kesayian@aol.com; don.m.marsh@hotmail.com

**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

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You state below "we will accept comments up until the point we will accept comments up until the point staff makes a recommendation to the hearing examiner".

The process, as I understand it, is that the City staff issues a recommendation and that recommendation is what the Director (Carol Helland or staff member) issues as the City's decision.

The City then publishes the decision.

Then parties have the opportunity to appeal the decision. If the parties do appeal, it is at that time that the Hearing Examiner process is invoked. Not before.

Is this correct? Or is the City staff making a a recommendation directly to the Hearing Examiner?

Thank you.

Loretta

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**Sent:** Thursday, October 19, 2017 1:54 PM

**To:** Loretta Lopez

**Cc:** [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com); [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)

**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

The emphasis should be on the word **minimum**. As I have noted in the past, the city is not able to issue a decision/recommendation before a comment period ends and we will accept comments up until the point staff makes a recommendation to the hearing examiner. Additionally, a recommendation/decision cannot be made until after the FEIS is released. And finally we don't expect the FEIS to be complete until early 2018. Therefore you most definitely have more time than November 2<sup>nd</sup>.

Look forward to receiving your comments.

Heidi

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**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Janis Medley <[jpmmedley@mac.com](mailto:jpmmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>; Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
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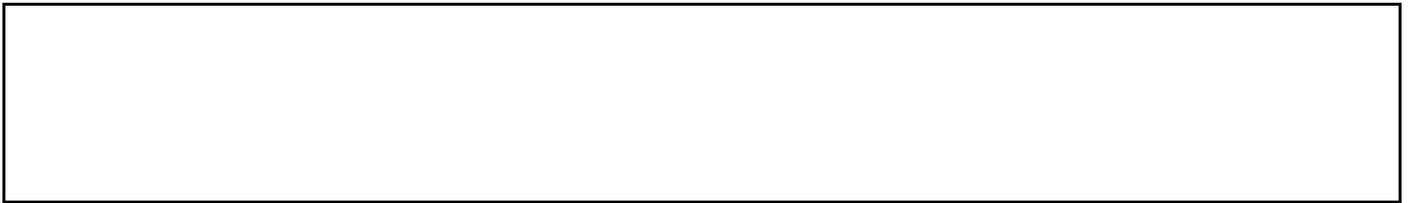
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**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



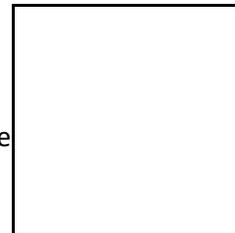
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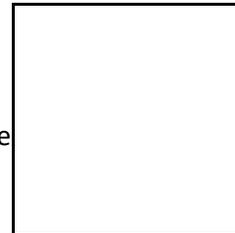
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**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

**Follow Up Flag:** Follow up  
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The City should re-phrase the statement to reflect that the comment period starts today and extends to \_\_\_\_\_. The use of the the phrase "minimum comment period ends on November 2" will cause confusion for most residents.  
Loretta

---

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**Sent:** Thursday, October 19, 2017 1:54 PM  
**To:** Loretta Lopez  
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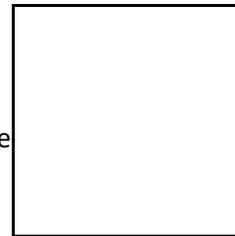
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**Cc:** Janis Medley; Karen Esayian; Don Marsh  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting? Will there be opportunity for residents to ask questions? Will the EIS consultant be present to listen to questions? Thank you.  
Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:48 PM  
**To:** 'HBedwell@bellevuewa.gov'  
**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain? Thank you.  
Loretta

---

**From:** City of Bellevue [mailto:bellevuewa@public.govdelivery.com]  
**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



You are subscribed to the Weekly Permit Bulletin for the City of Bellevue. This information has recently been updated, and is now available. Click [here](#) to see the Weekly Permit Bulletin. Thank you

---

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## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, October 20, 2017 3:31 PM  
**To:** Bedwell, Heidi  
**Cc:** jpmmedley@mac.com; kesayian@aol.com; don.m.marsh@hotmail.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Oh I see what you mean that Hearing Examiner process included as opposed to invoked.  
Thank you.  
Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, October 20, 2017 1:23 PM  
**To:** Loretta Lopez  
**Cc:** jpmmedley@mac.com; kesayian@aol.com; don.m.marsh@hotmail.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

You almost had it. The hearing examiner process for Process I applications is always included. It is process II decisions that must be appealed in order to "invoke the decision making process of the hearing examiner."

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, October 20, 2017 3:20 PM  
**To:** Bedwell, Heidi  
**Cc:** jpmmedley@mac.com; kesayian@aol.com; don.m.marsh@hotmail.com  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Heidi,

I have regarded the City's response to PSE application as the City's "decision."

Thank you for clarifying that the Director issues a recommendation, not a "decision".

Parties then must request appeal of the recommendation to invoke the decision making process of the Hearing Examiner.

Thank you.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, October 20, 2017 12:58 PM  
**To:** Loretta Lopez  
**Cc:** [jpmmedley@mac.com](mailto:jpmmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com); [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Not exactly- let me try to provide some additional clarity and information:

I have included the entire code section on Process I decisions for your reference and more detail. This process is applicable to the Conditional Use Permit. The Director prepares a recommendation not a decision. The hearing examiner makes a decision after holding a public hearing to hear public testimony and to consider the Director's recommendation. Once the hearing examiner has made a decision, it is their decision that is appealable to the city council. As staff, I draft the director's recommendation for the director's review. But it is a director's recommendation to the hearing examiner. And a hearing examiner decision that is appealable to the city council.

The proposal also requires a critical areas land use permit which is a process II decision. I have also provided this code excerpt attached. The difference with a process II application is that the Director makes a decision and that decision is appealable to the hearing examiner. The hearing examiner will hear the appeal of a process II decision at the same time it considers the Director's recommendation on a process I application. And the hearing examiner makes a decision on the process II application appeal.

Appeal of both final decisions (city council and hearing examiner's decision) is to Superior Court.

I think I covered everything but if not, please refer to the specific code sections attached for the required process. I trust this additional clarification helps. Hope everyone has a nice weekend!

-Heidi



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, October 20, 2017 2:13 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** [jpmedley@mac.com](mailto:jpmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com); [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I want to clarify a point regarding the City's recommendation on the PSE application.

You state below "we will accept comments up until the point we will accept comments up until the point staff makes a recommendation to the hearing examiner".

The process, as I understand it, is that the City staff issues a recommendation and that recommendation is what the Director (Carol Helland or staff member) issues as the City's decision.

The City then publishes the decision.

Then parties have the opportunity to appeal the decision. If the parties do appeal, it is at that time that the Hearing Examiner process is invoked. Not before.

Is this correct? Or is the City staff making a a recommendation directly to the Hearing Examiner?

Thank you.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Thursday, October 19, 2017 1:54 PM  
**To:** Loretta Lopez  
**Cc:** [jmedley@mac.com](mailto:jmedley@mac.com); [kesayian@aol.com](mailto:kesayian@aol.com); [don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)  
**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

The emphasis should be on the word **minimum**. As I have noted in the past, the city is not able to issue a decision/recommendation before a comment period ends and we will accept comments up until the point staff makes a recommendation to the hearing examiner. Additionally, a recommendation/decision cannot be made until after the FEIS is released. And finally we don't expect the FEIS to be complete until early 2018. Therefore you most definitely have more time than November 2<sup>nd</sup>.

Look forward to receiving your comments.  
Heidi

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Thursday, October 19, 2017 3:48 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Janis Medley <[jmedley@mac.com](mailto:jmedley@mac.com)>; Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>; Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

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**Sent:** Thursday, October 19, 2017 1:40 PM  
**To:** Loretta Lopez  
**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17



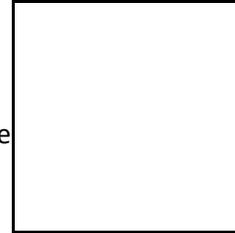
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## Bedwell, Heidi

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**From:** Kathy Judkins <kathy.judkins@gmail.com>  
**Sent:** Tuesday, November 14, 2017 12:31 PM  
**To:** Bedwell, Heidi  
**Subject:** Re: Permit comment for Energize Eastside

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you Heidi. I see that it says Project instead of President in my email ending.  
Also "against this permit" not record.  
Please note these corrections  
See you tonight  
Kathy Judkins

Sent from  
my iPhone X

On Nov 14, 2017, at 11:59 AM, <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)> <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)> wrote:

Hi Kathy,  
Thank you for your message and comments regarding the proposed PSE project. Your comments are included as part of the project file and I have you listed as a party of record. I'm happy to hear you will be attending the meeting this evening. I would encourage you to speak with PSE staff at the meeting as well to explore whether your request for a meeting with them and your neighbors can be accommodated. In any event they will be available this evening to answer questions if you have any. Thank you again and I look forward to meeting you this evening.  
-Heidi

**Heidi M. Bedwell**  
Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

-----Original Message-----

From: Kathy Judkins [<mailto:kathy.judkins@gmail.com>]  
Sent: Tuesday, November 14, 2017 11:47 AM  
To: Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
Subject: Permit comment for Energize Eastside  
Heidi

I will be at the meeting tonight. I wish to be a party of record for the EE project. I have two poles in my yard at 4324-136th Pl SE Bellevue, WA 98006. The proposed Permit states the new pole will be 80 feet tall with 230kwh lines. This will be an extreme danger to my home in the event of an earthquake or other natural disaster. The pole with that height will fall on my home or my neighbor Kelly Xu's home. We also have the Olympic Pipeline in close proximity to this pole. Also the only access to my home is on the easement drive. I am a 71 year old widow and need access to my driveway. No written details have been mailed to me by Energize the Eastside other than this

October 19 Permit Bulletin. I have refused to meet alone with EE people. I asked to have a meeting with my neighbors on the easement and PSE/EE project people but that request was not given. Please list me as a party of record as being against this record. No permit should be issued, I believe that batteries are the answer.

Thank you

Kathy Judkins

CENSE member

Former Somerset Community Association Project for 3 years Somerset resident since 1983 4324-136th

PI SE Bellevue, WA 98006-2237

Sent from

my iPhone X

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 08, 2017 5:46 PM  
**To:** Bedwell, Heidi  
**Cc:** Helland, Carol  
**Subject:** RE: PSE 18 mile project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,  
Would you send a copy of the application to me.  
Thank you.  
Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, September 08, 2017 3:35 PM  
**To:** Loretta Lopez  
**Cc:** CHelland@bellevuewa.gov  
**Subject:** RE: PSE 18 mile project

Hi Loretta,  
The City will not issue a staff recommendation on the CUP application before the FEIS is published. We still anticipate issuance of the FEIS in the first quarter of 2018.

We received an application just this morning from PSE. So this process has now, just, begun. ☺

Hope you've had a pleasant summer.  
-Heidi



**Heidi M. Bedwell**  
Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, September 08, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE 18 mile project

Hi Heidi,

PSE has announced that it intends to file a application soon. The FEIS is not going to be ready until 1st quarter 2018.

Does the City intend to issue a permit decision before the FEIS is published in 2018?

Or has the City changed the date of issuance of FEIS?

Thank you.

Loretta

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 08, 2017 5:42 PM  
**To:** Bedwell, Heidi  
**Cc:** Helland, Carol  
**Subject:** RE: PSE 18 mile project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you Heidi.  
Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, September 08, 2017 3:35 PM  
**To:** Loretta Lopez  
**Cc:** CHelland@bellevuewa.gov  
**Subject:** RE: PSE 18 mile project

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-Heidi



**Heidi M. Bedwell**  
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**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, September 08, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE 18 mile project

Hi Heidi,

PSE has announced that it intends to file a application soon. The FEIS is not going to be ready until 1st quarter 2018.

Does the City intend to issue a permit decision before the FEIS is published in 2018?

Or has the City changed the date of issuance of FEIS?

Thank you.

Loretta

## Bedwell, Heidi

---

**From:** Bedwell, Heidi  
**Sent:** Friday, September 08, 2017 4:35 PM  
**To:** Loretta Lopez  
**Cc:** Helland, Carol  
**Subject:** RE: PSE 18 mile project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Loretta,

The City will not issue a staff recommendation on the CUP application before the FEIS is published. We still anticipate issuance of the FEIS in the first quarter of 2018.

We received an application just this morning from PSE. So this process has now, just, begun. ☺

Hope you've had a pleasant summer.

-Heidi



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, September 08, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE 18 mile project

Hi Heidi,

PSE has announced that it intends to file a application soon. The FEIS is not going to be ready until 1st quarter 2018.

Does the City intend to issue a permit decision before the FEIS is published in 2018?

Or has the City changed the date of issuance of FEIS?

Thank you.

Loretta

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Monday, September 11, 2017 11:59 AM  
**To:** Bedwell, Heidi  
**Cc:** Helland, Carol  
**Subject:** RE: PSE 18 mile project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you.  
Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Monday, September 11, 2017 6:45 AM  
**To:** Loretta Lopez  
**Cc:** CHelland@bellevuewa.gov  
**Subject:** RE: PSE 18 mile project

I should have provided the file numbers. Here they are:  
17-120556-LB  
17-120557-LO

---

**From:** Bedwell, Heidi  
**Sent:** Monday, September 11, 2017 7:38 AM  
**To:** 'Loretta Lopez'  
**Cc:** Helland, Carol  
**Subject:** RE: PSE 18 mile project

Good morning Loretta.

Sure, a copy of the file can be provided to you. Please follow the directions on the following link in order to make this request with our records department <https://bellevuewa.gov/city-government/departments/city-clerks-office/public-records/development-services-records/> They should be in touch with you shortly.

Thank you.  
Heidi

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, September 08, 2017 5:46 PM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Cc:** Helland, Carol <CHelland@bellevuewa.gov>  
**Subject:** RE: PSE 18 mile project

Heidi,

Would you send a copy of the application to me.

Thank you.

Loretta

---

**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [<mailto:HBedwell@bellevuewa.gov>]  
**Sent:** Friday, September 08, 2017 3:35 PM  
**To:** Loretta Lopez  
**Cc:** [CHelland@bellevuewa.gov](mailto:CHelland@bellevuewa.gov)  
**Subject:** RE: PSE 18 mile project

Hi Loretta,

The City will not issue a staff recommendation on the CUP application before the FEIS is published. We still anticipate issuance of the FEIS in the first quarter of 2018.

We received an application just this morning from PSE. So this process has now, just, begun. ☺

Hope you've had a pleasant summer.  
-Heidi



**Heidi M. Bedwell**  
Energize Eastside EIS Project Manager  
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Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, September 08, 2017 3:37 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Subject:** PSE 18 mile project

Hi Heidi,

PSE has announced that it intends to file a application soon. The FEIS is not going to be ready until 1st quarter 2018.

Does the City intend to issue a permit decision before the FEIS is published in 2018?

Or has the City changed the date of issuance of FEIS?

Thank you.

Loretta

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Monday, October 23, 2017 3:10 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Application/November 14 meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi,

Yes I understand about buried in the inbox. I assume that is what happened since you always respond to questions.

Yes I agree that the community will have different expectations of the meeting in light of the EIS process.

If we know in advance of the meeting of the purpose and what to expect then it will be better for all.

Thank you.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Monday, October 23, 2017 12:57 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Application/November 14 meeting

Sorry, yes, this one got buried in my inbox. Our usual meeting objective is pretty simple. City staff provides an overview of the process and decision criteria and the project applicant provides an overview of their project. I am mindful that the community has had several public meetings as part of the EIS process and might have different expectations of the meeting. I'll have additional communication on how the public meeting will occur and planned to reach out to you and Don when I have more details to share. Seems like the 14<sup>th</sup> will be here soon. Thanks for your patience.

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, October 20, 2017 3:37 PM  
**To:** Bedwell, Heidi  
**Cc:** don.m.marsh@hotmail.com; jpmedley@mac.com; kesayian@aol.com  
**Subject:** PSE Application/November 14 meeting

Heidi,

You may not have had time to respond to my message below.

No need to respond today. This can wait until next week. We do want to know the purpose of the meeting.

Thank you.

Loretta

---

**From:** Loretta Lopez  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** 'HBedwell@bellevuewa.gov'

**Cc:** 'Janis Medley'; 'Karen Esayian'; 'Don Marsh'

**Subject:** RE: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

One other question. What is the format of the November 14 meeting that is set forth in the notice? When I have attended such meetings in the past the developer presents the plans for the project. Is the format for the November 14 meeting?

Will there be opportunity for residents to ask questions?

Will the EIS consultant be present to listen to questions?

Thank you.

Loretta

---

**From:** Loretta Lopez

**Sent:** Thursday, October 19, 2017 2:48 PM

**To:** 'HBedwell@bellevuewa.gov'

**Cc:** 'Janis Medley'; Karen Esayian; 'Don Marsh'

**Subject:** FW: City of Bellevue Weekly Permit Bulletin 10-19-17/PSE project

Hi Heidi,

I just read the notice of the PSE project The notice states that the minimum comment period ends November 2. My understanding, based on your messages on this issue, was that we would have more time to comment. Perhaps I am misconstruing the notice,. Would you please explain?

Thank you.

Loretta

---

**From:** City of Bellevue [mailto:bellevuewa@public.govdelivery.com]

**Sent:** Thursday, October 19, 2017 1:40 PM

**To:** Loretta Lopez

**Subject:** City of Bellevue Weekly Permit Bulletin 10-19-17

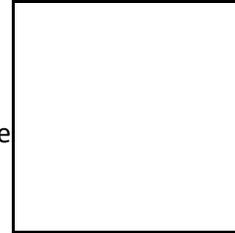


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## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Friday, September 08, 2017 5:46 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Project/ Danger Zone tree cutting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

OK Thank you.  
Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, September 08, 2017 3:36 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Project/ Danger Zone tree cutting

I'm checking on the information we have related to the danger zone. Will get back to you as soon as I have additional information.

Heidi

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, September 08, 2017 3:42 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE Project/ Danger Zone tree cutting

Hi Heidi,

We have had some questions from residents in Bridle Trails about PSE plans regarding the Danger Zone area. The Danger Zone area is outside of the easement.

Since the trees in BT are tall, in some cases there are trees outside of easement but in area that PSA has designated as Danger Zone.

Will trees in the Danger Zone be cut?

Thank you.

Loretta

## Bedwell, Heidi

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Wednesday, September 20, 2017 11:45 AM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Project/ Danger Zone tree cutting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

In Bridle Trails, many or most of the trees along the line and in the Danger Zone are large tall trees. PSE must intend to cut most of the trees since most are all enough to go across the line. We will have to assume that the trees in the Danger Zone will be cut.

Thank you for your response.

Loretta

---

**From:** HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Tuesday, September 19, 2017 1:51 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Project/ Danger Zone tree cutting

Hi Loretta,

What I understand from PSE is that the Danger Zone isn't changing from the current situation with the 115kV line. Tree removal would only be considered if there were an imminent threat to the existing 115 kV transmission lines or the replacement 230 kV lines. The decision to remove a tree from this zone is based on a combination of tree height, species, health, and distance from the wires. I am not aware of any particular trees proposed for removal at this time. PSE works with property owners when a tree is identified and determined to be an imminent threat based on the criteria note previously.

-Heidi

---

**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Friday, September 08, 2017 5:46 PM  
**To:** Bedwell, Heidi  
**Subject:** RE: PSE Project/ Danger Zone tree cutting

OK Thank you.

Loretta

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**From:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov) [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Friday, September 08, 2017 3:36 PM  
**To:** Loretta Lopez  
**Subject:** RE: PSE Project/ Danger Zone tree cutting

I'm checking on the information we have related to the danger zone. Will get back to you as soon as I have additional information.

Heidi

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**From:** Loretta Lopez [<mailto:llopez@mstarlabs.com>]  
**Sent:** Friday, September 08, 2017 3:42 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Subject:** PSE Project/ Danger Zone tree cutting

Hi Heidi,

We have had some questions from residents in Bridle Trails about PSE plans regarding the Danger Zone area. The Danger Zone area is outside of the easement.

Since the trees in BT are tall, in some cases there are trees outside of easement but in area that PSA has designated as Danger Zone.

Will trees in the Danger Zone be cut?

Thank you.

Loretta

## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Tuesday, September 12, 2017 9:29 AM  
**To:** Loretta Lopez  
**Cc:** CCO DS Records  
**Subject:** RE: Request for PSE application 1753-2017

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

The files in the current folder are only those that were submitted as part of the application. Additional items may be added to the project file when either the city requests revisions or additional information or when the applicant submits additional information. Feel free to check in with me in the future and we can coordinate your review of additional documents if they are added to the file.

Heidi

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**From:** Loretta Lopez [mailto:llopez@mstarlabs.com]  
**Sent:** Tuesday, September 12, 2017 10:18 AM  
**To:** Bedwell, Heidi  
**Subject:** FW: Request for PSE application 1753-2017

Hi Heidi,

I requested the PSE application using the file numbers that you sent to me.

The records department responded with the message below. On the issue of the documents in the folder that you set up. Are there any other files that you will be placing in the folder in the future? If so then, I will periodically check with you.

Thank you.

Loretta

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**From:** [dsRecords@bellevuewa.gov](mailto:dsRecords@bellevuewa.gov) [mailto:dsRecords@bellevuewa.gov]  
**Sent:** Tuesday, September 12, 2017 7:06 AM  
**To:** Loretta Lopez  
**Cc:** [dsRecords@bellevuewa.gov](mailto:dsRecords@bellevuewa.gov)  
**Subject:** RE: Request for PSE application 1753-2017

Hi Loretta:

If the project is still under review, time would depend on when they reviewer hand us [Records] the documents. Heidi set up the documents in a folder but we cannot send a file folder via e-mail attachment. Below is the list of documents in the file folder. If you need all, we could either download the items to a CD [free], or to a USB [\$5.00]. Or could send few select items via e-mail as long the items are under 32MB [city bandwidth].

Let us know how you would like to proceed.

 Photosims	9/11/2017 9:53 AM	File folder	
 forms_bill_to.pdf	8/28/2017 1:52 PM	Adobe Acrobat D...	152 KB
 PSE EE Delineation Report.pdf	5/19/2016 3:46 PM	Adobe Acrobat D...	90,053 KB
 PSE EE forms_landuseCALUP.pdf	8/24/2017 4:12 PM	Adobe Acrobat D...	171 KB
 PSE EE forms_landuseCUP.pdf	8/24/2017 4:12 PM	Adobe Acrobat D...	1,053 KB
 PSE EE GeoHaz Areas - Bellevue.pdf	7/11/2017 4:58 PM	Adobe Acrobat D...	1,301 KB
 PSE EE Reliability Cert.pdf	8/28/2017 8:44 AM	Adobe Acrobat D...	94 KB
 PSE EE RIC Lighting Plan.pdf	8/31/2017 1:01 PM	Adobe Acrobat D...	786 KB
 PSE EE SB ASA.pdf	9/8/2017 8:25 AM	Adobe Acrobat D...	12,874 KB
 PSE EE SB CAR with Appendices.pdf	8/30/2017 2:52 PM	Adobe Acrobat D...	40,042 KB
 PSE EE SB CUP Proposal Description.pdf	9/7/2017 1:29 PM	Adobe Acrobat D...	352 KB
 PSE EE SB Plan Sheets.pdf	8/31/2017 8:32 AM	Adobe Acrobat D...	29,861 KB
 PSE EE SB Site Plan T-Line.pdf	8/31/2017 10:28 AM	Adobe Acrobat D...	18,305 KB
 PSE EE SB Veg Mgmt Plan.pdf	8/30/2017 2:40 PM	Adobe Acrobat D...	32,359 KB
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 KOP Central_15-BEL.pdf	7/19/2017 11:06 AM	Adobe Acrobat D...	3,833 KB
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 KOP South_24_Segment_2-BEL.pdf	7/14/2017 2:22 PM	Adobe Acrobat D...	3,622 KB

Regards:



*One City*

Committed to Excellence

**Clarence Copeland** | Public Records Analyst |

City Of Bellevue - CCO | Development Services Records

DS Records 425.452.7914 | [dsrecords@bellevuewa.gov](mailto:dsrecords@bellevuewa.gov)

Check the status of your permit at [www.MyBuildingPermit.com](http://www.MyBuildingPermit.com)

Submit a [request](#)

Check the [status](#) of your request

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**Sent:** Monday, September 11, 2017 1:38 PM

**To:** CCO DS Records <[dsRecords@bellevuewa.gov](mailto:dsRecords@bellevuewa.gov)>

**Subject:** Request for PSE application 1753-2017

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How long does it typically take to receive a response. If possible, would you send to me today?

Thank you.

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## Bedwell, Heidi

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**Follow Up Flag:** Follow up  
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OK Thank you.  
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