

Bedwell, Heidi

From: Vestal, Jo <jvestal@williamskastner.com>
Sent: Thursday, April 26, 2018 2:18 PM
To: Bedwell, Heidi
Cc: Vestal, Jo
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.
5. The proposed actions in the Somerset area are totally unacceptable because of the proposed actions' significant impact on the existing aesthetic environment. As recognized in the EIS, the Somerset neighborhood would experience the most pronounced impact to the aesthetic environment of anywhere else while at the same time the Somerset residents have the highest degree of viewer sensitivity. Many have purchased specifically because of the aesthetic environment and all have taken steps to protect it with enforceable covenants. All available options should be taken to avoid this pronounced impact on the Somerset neighborhood residents. Mitigation measures which should be required would include either running the transmission lines through an alternative corridor outside of the Somerset neighborhood or undergrounding the transmission lines, which might also require a new corridor because of the petroleum pipelines.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,

Josephine B. Vestal

4433 137th Ave SE

Bellevue, WA 98006

jvestal@wkg.com

Josephine B. Vestal

Williams Kastner | Attorney at Law
601 Union Street, Suite 4100
Seattle, WA 98101-2380
P: 206-233-2894 | F: 206-628-6611
www.williamskastner.com | [Bio](#) | [V-Card](#)

WASHINGTON OREGON ALASKA

Bedwell, Heidi

From: Bedwell, Heidi
Sent: Friday, April 13, 2018 1:42 PM
To: 'Lori E'
Subject: RE: Comments on PSE's Energize Eastside permit application

Hi Lori,
I hope that you and your family are well.

Thank you for providing comments on PSE's application to construct a new transmission line and substation in the City of Bellevue. The comments are part of the city's record and will be considered as the city processes PSE's application. Because you provided comments to the city regarding this application, you will be notified of the public hearing when it is scheduled including notification of the Director's decision and recommendation on the subject permits. Please note that the Director of Development Services will make a recommendation to the city's hearing examiner on the conditional use permit and the hearing examiner will make the final decision. Appeal of the hearing examiner's decision is made to the city council.

Again, thank you for taking the time to express your interest in the project. You can subscribe to alerts and find more information about the permit and process on the city's permitting page <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/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 and www.mybuildingpermit.com

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

From: Lori E [mailto:ljdemail@comcast.net]
Sent: Friday, April 13, 2018 12:53 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

Please include me as a "party of record".

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because you have a responsibility to the citizens. Safety should be your number one priority. PSE won't take responsibility as we have witnessed recently with their responses to the tribes on building without permits in Tacoma, and the people in Greenwood for the gas leak and explosion.

Energize Eastside is unnecessary and wasteful of ratepayer funds. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. It damages communities and the environment by removing thousands of valuable urban trees. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Lori Elworth
8605 129th Ct SE
Newcastle WA 98056

Bedwell, Heidi

From: Bedwell, Heidi
Sent: Thursday, April 12, 2018 9:34 AM
To: 'Warren Raven'
Subject: RE: Comments on PSE's Energize Eastside permit application

Thank you for providing comments on PSE's application to construct a new transmission line and substation in the City of Bellevue. The comments are part of the city's record and will be considered as the city processes PSE's application. Because you provided comments to the city regarding this application, you will be notified of the public hearing when it is scheduled including notification of the Director's decision and recommendation on the subject permits. Please note that the Director of Development Services will make a recommendation to the city's hearing examiner on the conditional use permit and the hearing examiner will make the final decision. Appeal of the hearing examiner's decision is made to the city council.

Again, thank you for taking the time to express your interest in the project. You can subscribe to alerts and find more information about the permit and process on the city's permitting page <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/energize-eastside-updates/>

Note: If you are interested in the public hearing in Renton you should be in contact with staff there regarding the city's permitting process. Jill Ding, jd Ding@rentonwa.gov www.rentonwa.gov



Heidi M. Bedwell
Energize Eastside EIS Project Manager
Environmental Planning Manager, Land Use Division
Development Services Department
425-452-4862
www.bellevuewa.gov and www.mybuildingpermit.com

From: Warren Raven [mailto:wrenfoto@hotmail.com]
Sent: Thursday, April 12, 2018 9:13 AM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. \$1 Billion on PSE project or \$3 million by putting solar on 100 homes. Which is the more fiscally responsible way to go? Both generate the energy needed and deliver the energy needs that PSE needs. Which way should the voters spend their money?

Please notify me when any Renton public hearing for this project is announced.

Sincerely,

Warren Raven
12833 Holiday Dr NE
Kirkland, WA 98034
PSE Customer

Bedwell, Heidi

From: Bedwell, Heidi
Sent: Tuesday, April 10, 2018 8:30 AM
To: 'Barbra Chevalier'
Subject: RE: Energize Eastside permits

Hello Ms. Chevalier

Thank you for providing comments on PSE's application to construct a new transmission line and substation in the City of Bellevue. The comments are part of the city's record and will be considered as the city processes PSE's application. Because you provided comments to the city regarding this application, you will be notified of the public hearing when it is scheduled including notification of the Director's decision and recommendation on the subject permits.

Please note that the Director of Development Services will make a recommendation to the city's hearing examiner on the conditional use permit and the hearing examiner will make the final decision. Appeal of the hearing examiner's decision is made to the city council.

Again, thank you for taking the time to express your interest in the project. You can subscribe to alerts and find more information about the permit and process on the city's permitting page <https://development.bellevuewa.gov/zoning-and-land-use/public-notice-and-participation/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 and www.mybuildingpermit.com

From: Barbra Chevalier [mailto:barbra.n.chevalier@gmail.com]
Sent: Saturday, April 07, 2018 5:14 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: Energize Eastside permits

Good afternoon, Ms. Bedwell,

I am a Bellevue resident, and I am writing to comment on the proposed permits for PSE's Energize Eastside project.

I urge the City to DENY these requests for multiple reasons.

PSE has failed to demonstrate that this particular project is the necessary solution. This proposal was first rolled out 5 years ago. That is a lifetime in battery and conservation technology. Furthermore, according to PSE's own documentation, electricity demand on the Eastside has flattened, not grown, despite the population growth we've experienced.

PSE has failed to demonstrate that this project will be safe. These proposed lines will run within 50 yards of schools and homes along the aging Olympic pipeline. While an accident or natural disaster may be a rare occurrence, this risk is unacceptable without strong, clear justification for the project.

PSE has failed to acknowledge viable alternatives. With increasing numbers of solar panel installations and the advancement of battery technology, this monstrosity of a project becomes less and less viable. Our grid MUST move to greener, cleaner, technologically-based solutions if we intend to leave a positive world behind for our children.

PSE has failed to own up to the real reason for this proposal. PSE's parent company, an Australian investment conglomerate, stands to make a tremendous profit off of the construction of a 230,000 volt transmission line.

PSE has failed to justify the tragic loss of trees that this project would entail. Cutting edge social science and emerging research suggests that trees offer far more than aesthetic benefits. From decreasing mental illness and the rates of underweight neonates to cleaning the air and serving as carbon sinks, trees improve human life in a way that we are only just beginning to realize. Removing thousands of them is not something to be undertaken lightly.

The City ultimately exists to serve the needs and provide for the long term welfare of its residents. The Energize Eastside project, as currently proposed, does neither. I urge the City Council to deny PSE the permits it has requested to move forward with this disastrous project.

Thank you,

Barbra Chevalier
6541 126th Ave SE
Bellevue, WA 98006

Bedwell, Heidi

From: Bedwell, Heidi
Sent: Tuesday, April 10, 2018 8:29 AM
To: 'The Shaws'
Subject: RE: Comments on PSE's Energize Eastside permit application

Thank you for providing comments on PSE's application to construct a new transmission line and substation in the City of Bellevue. The comments are part of the city's record and will be considered as the city processes PSE's application. Because you provided comments to the city regarding this application, you will be notified of the public hearing when it is scheduled including notification of the Director's decision and recommendation on the subject permits. Please note that the Director of Development Services will make a recommendation to the city's hearing examiner on the conditional use permit and the hearing examiner will make the final decision. Appeal of the hearing examiner's decision is made to the city council.

Again, thank you for taking the time to express your interest in the project. You can subscribe to alerts and find more information about the permit and process on the city's permitting page <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/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 and www.mybuildingpermit.com

From: The Shaws [mailto:ceoping@hotmail.com]
Sent: Friday, April 06, 2018 11:00 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
David Shaw
13610 SE 7th St. Bellevue WA 98005

April 6, 2018

City of Bellevue
Attn: Heidi M. Bedwell, Environmental Planning Manager
450 110th Ave NE
Bellevue, WA 98004

RECEIVED
APR 11 REC'D
Development Services

Re: Energize Eastside Conditional Use Permit File #17-120556-LB and Critical Areas Land Use Permit File #17-120557-LO

As homeowners and residents in Bellevue we comment as citizens. The Comprehensive Plan protects the scale and character of existing neighborhoods through policies that call designs to minimize visual impacts to adjacent land uses. Bellevue is a city in a park.

There are alternatives to poles and wires being used around the world. These are cheaper, safer, greener, and even more reliable. Why is PSE continuing to pursue a system from 1929?

The undeveloped Coal Creek Park between Newport Hills and Somerset will be divided by PSE's poles and wires. The difference between the height and dimension of the wood poles now and the new metal construction is substantial. By taking out additional tree and vegetation as described we will see a dramatic degradation of our landscape views. The poles will tower over the tree canopy and be quite visible from many homes in Newport Hills as well as Somerset in the south segment of Bellevue. Coal Creek Park is a beautiful natural landscape and living along this ravine since the early 70's gives us such pleasure. These urban neighborhoods were built around this natural habitat. Preservation is essential to maintain our most important commitment the citizens.

PSE's project, Energize Eastside does not belong collocated with two high pressure petroleum jet fuel pipelines through our neighborhoods. Aside from the safety concerns during construction we feel the EIS neglects to evaluate the condition of these aging pipes. The risks are too great.

We know of the disaster from the Bellingham explosion where 3 boys were killed. How vulnerable our highly populated eastside will be if an explosion were to occur here.

The explosion in Greenwood has demonstrated PSE's poor safety record with their own equipment. How responsible are they working with others? Who will be responsible? Will there be a response plan in place for the worst case scenario if a gas leak, or explosion occurs? PSE does not accept responsibility for their carelessness and continue to place blame on the victims of Greenwood. They are lucky no one died from their negligence.

Please deny PSE's request for permit, the city of Bellevue can do better.

Sincerely,

Mary and Maury Dahlquist
4944 127th PI SE



Bedwell, Heidi

From: Bedwell, Heidi
Sent: Thursday, April 05, 2018 4:41 PM
To: 'yhzs'
Subject: RE: Comments on PSE's Energize Eastside permit application

Thank you for providing comments on PSE's application to construct a new transmission line and substation in the City of Bellevue. The comments are part of the city's record and will be considered as the city processes PSE's application. Because you provided comments to the city regarding this application, you will be notified of the public hearing when it is scheduled including notification of the Director's decision and recommendation on the subject permits. Please note that the Director of Development Services will make a recommendation to the city's hearing examiner on the conditional use permit and the hearing examiner will make the final decision. Appeal of the hearing examiner's decision is made to the city council.

Again, thank you for taking the time to express your interest in the project. You can subscribe to alerts and find more information about the permit and process on the city's permitting page <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/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 and www.mybuildingpermit.com

From: yhzs [mailto:qs_yhzs@yahoo.com]
Sent: Tuesday, April 03, 2018 2:34 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.
5. ELF-EMF radiation in Tye Middle School is already ten times the recommended maximum expose of 1 milligauss: <https://ecfsapi.fcc.gov/file/7520941207.pdf>. The proposed the project will further exacerbate this serious issue by quadrupling the amount of radiation our kids expose to that may increase risk of illness such as childhood leukemia.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Simon Sun

12634 SE 56th St
Bellevue, WA 98006

Bedwell, Heidi

From: Loretta Lopez <llopez@mstarlabs.com>
Sent: Wednesday, April 04, 2018 3:25 PM
To: Bedwell, Heidi
Cc: hansennp@aol.com; Warren Halverson
Subject: RE: One project/Two permits

Heidi,

My mistake- I wrote Lincoln Center (NYC) instead of Lincoln Square.

I understand that the FEIS is not a permit.

I read the FEIS. I read the section about 2 permits. My point is that during Phase 1, Phase 2, DEIS Phase 1 and DEIS Phase 2 that the that there was never any reference to the possibility of 2 permits for 1 project. The public had no idea that Bellevue would consider the PSE project, for the portion which runs through Bellevue, as 2 separate projects.

I understand that there will be multiple permits since there are multiple cities. Renton issues 1 permit. Newcastle issues 1 permit. Redmond issues 1 permit.

I am trying to understand the City's position in allowing PSE to file 2 permits for 1 project.

On the issue of this project similar to Sound Transit project - Are you stating that Sound Transit filed for 2 permits for the Sound Transit project through Bellevue?

Loretta

From: HBedwell@bellevuewa.gov [mailto:HBedwell@bellevuewa.gov]
Sent: Wednesday, April 04, 2018 11:24 AM
To: Loretta Lopez
Subject: RE: One project/Two permits

Loretta,

We have not received any new information from PSE regarding additional permit submittal.

The purpose of an environmental impact statement is to evaluate potential adverse environmental impacts associated with a project. The EIS is not a permit and does not stipulate the required permitting process. The Final EIS does reference the permits submitted for the southern portion of the project and the phased construction. The Final EIS also explains that the project will require multiple permits from multiple jurisdictions.

The permitting process underway in Bellevue is not dissimilar to other linear infrastructure projects (such as sound transit or roadway and utility projects), and we are processing the permit applications that have been submitted consistent with the provisions in our Land Use Code. The city does not believe we are processing the application in a manner inconsistent with our planning and permitting processes.

When I have completed my review and prepared a revision request, the information will be posted to the city's permit project webpage.

-Heidi

From: Loretta Lopez [<mailto:llopez@mstarlabs.com>]
Sent: Tuesday, April 03, 2018 6:09 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Cc: hansennp@aol.com; Warren Halverson <whalvrsn1@frontier.com>
Subject: RE: One project/Two permits

Heidi,

I meant to add the questions, what is the status of the Northern segment. Carol Helland indicated the Northern segment (BT) would be filed in June. Is that still the case.

On the issue that the City is allowing PSE to file 2 applications for 1 project, are there other projects has the City allowed that adopted this segmented process.

According to PSE the entire linear project has to be built. There is no possibility that ½ of the project would be built and then stop. As an example, the Lincoln Center buildings are multistory linear projects. I cannot imagine that the City would allow Lincoln Center to file for permits for the foundation and first 10 floors and then file an application 6 months later for the following 20 floors.

Please explain why the City is allowing PSE to proceed in manner that is inconsistent with planning and permitting processes.

Thank you.

Loretta

From: Loretta Lopez
Sent: Monday, April 02, 2018 10:12 PM
To: 'HBedwell@bellevuewa.gov'
Cc: hansennp@aol.com
Subject: One project/Two permits

Heidi,

As members of the Bridle Trails Community Club, we are concerned about the segmentation of the PSE project. As you know, there was never any indication during the EIS process that this project was ever to be considered as two projects.

Apparently the PSE has convinced the City to allow PSE to proceed as if the PSE project consists of 2 projects and therefore will file 2 applications for 2 permits. There are then 2 City recommendations/reports, 2 public meetings, 2 hearing before the Hearing Examiner, 2 decisions by the Hearing Examiner, 2 reviews of the decision by the City Council, 2 Superior Court Appeals, 2 Court of Appeals proceeding, 2 appeals to the Washington Supreme Court.

But there is only 1 project.

You mention below that the reason that there the City is allowing 2 applications is because of the way PSE chooses to construct the project. You add that you expect that you will request additional information.

Please let us know when you have completed your request to PSE. We want to know why the City is allowing PSE to proceed in a manner that is not fair to Bridle Trails residents and will cost the taxpayers more money than necessary.

Thank you.

Loretta

----- Original message -----

From: HBedwell@bellevuewa.gov

Date: 3/30/18 3:28 PM (GMT-08:00)

To: hansennp@aol.com

Subject: RE: PSE Conditional Use Materials

Hi Norm,

City staff are still evaluating PSE's application. I expect I'll have a request for additional information. That will be available in the file when I have completed my first review of the application and am finished preparing the revision letter.

Regarding the project phasing PSE has provided the following information in their application:

"The existing system is not robust enough to maintain reliable service if the entire facility is taken out of service at one time. Therefore, the Energize Eastside Project will be constructed in two phases. This will allow PSE to keep the existing 115 kV facilities partially in service during construction, which will allow PSE to maintain reliable service to all customers during construction. This approach best ensures that PSE continues to deliver reliable electricity to all of PSE's customers during construction."

Have a nice weekend.

-Heidi

Bedwell, Heidi

From: Maya Keselman <maya.keselman@gmail.com>
Sent: Tuesday, March 27, 2018 8:48 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. Power lines and pipelines will be close to Tyee Middle school and will run through residential areas. **Kids, high voltage power lines and pipelines do NOT mix well.**
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. PSE can utilize any of the recent technologies.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Maya Keselman
4586 144th Ave. SE
Bellevue WA 98006

Bedwell, Heidi

From: Jeanne DeMund <jcdemund@gmail.com>
Sent: Monday, March 26, 2018 5:19 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
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3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,

Jeanne DeMund
2811 Mountain View Ave. N.
Renton, WA 98056
jcdemund@gmail.com

Bedwell, Heidi

From: Yvonne Seidl <yseidl@gmail.com>
Sent: Monday, March 26, 2018 4:50 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
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3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
[YOUR NAME]
[YOUR ADDRESS]

Bedwell, Heidi

From: Jui Yu Chang <juiyuchang2003@yahoo.com>
Sent: Monday, March 26, 2018 9:36 AM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Sincerely,
Irene Chang
4405 138th Ave. S.E., Bellevue, WA 98006

Sent from Yahoo Mail on Android

Bedwell, Heidi

From: amy faith <amygfaith@yahoo.com>
Sent: Tuesday, March 20, 2018 11:06 PM
To: Bedwell, Heidi
Subject: PSE permit applications for Bellevue 's part of Energize Eastside

Dear Ms Bedwell:

I am writing to express my dismay about the Energize Eastside project . I see that PSE is now applying for permits and wanted remind you that the community does not want this transmission line .

Four thousand mature trees are slated to be cut. We need to preserve, not cut down our trees. The replacements will be sticks, in comparison. The trees to be destroyed take decades to grow to the height they have reached.

A gas line will be dangerously close to the transmission line. There have been explosions caused by this situation. PSE knows this, yet chooses to proceed.

Using batteries, solar, and wind energy would be far cheaper, would not harm the environment, and has been used with success in other states. PSE needs to consider this as a viable option.

PSE manipulated its data to make it seem like this transmission line is needed, when it is not. CENSE completed a load study using the same data PSE did and discovered that PSE did indeed use scenarios that would never happen in real life in order to justify the need for this project.

PSE stands to gain a 7% profit for this. They don't care about the trees that will be cut, the environment they will be harming, or the danger of putting up a transmission line near a gas line.

Thank you for listening,
Amy Faith
15210 NE 8th St Unit D4
Bellevue, WA 98007

Bedwell, Heidi

From: Barbara Braun <bbraun@stratery.com>
Sent: Saturday, March 17, 2018 8:21 AM
To: Bedwell, Heidi
Cc: Barbara Braun
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside.

The responses to the comments I submitted during the Phase 1 EIS are inadequate and indicates the permits for this project should be denied.

My concerns and questions raised in the EIS are not answered. Answers to questions provided by PSE and the EIS development team use old fashion, out dated data and biased studies to justify an old fashion, unjustified, unsafe, high cost, oversized "solution" to a non-existent "problem." Alternative 2 is a far superior solution and PSE fails to adequately analyze that solution.

1. The FEIS and permit applications continue to outsize the need for this project and fails to use current data and analysis to size future demands and corner case use scenarios. MANY other utilities, including BPA, are stepping up to the reality that the world has changed and better solutions exist. The "traditional transmission solution" proposed by PSE is not the best, cheapest or safest solution for delivering reliable energy. PSE fails to adequately study Alternative 2.
2. The proposed solution is not prudent on any front - cost, reliability, safety or environment, and should not qualify for rate payer increases to fund it. Alternative 2 is far superior.
3. The current solutions fails to address in our local or national security and leaves us highly vulnerable to malicious disruption. Alternative 2 is far superior.
4. The current solution fails to use modern best practices in evaluating the value of carbon sequestration and climate control services of our existing tree canopy. It is climate-future irresponsible. Alternative 2 is far superior.
5. The proposed Energize Eastside solution leaves vulnerable citizens and students in high danger due to proximity to the aging Olympic pipeline. The FEIS fails to employ modern best practices in evaluating the danger and does not use modern spacing standards for safe co-location of transmission to pipeline. Just because we violate modern best practices with the current installed base of transmission lines, does not mean we should continue and further escalate the risk of a pipeline accident.
6. Further the cities and PSE fail to propose adequate preparation for how to respond to pipeline accidents and leaves the citizens vulnerable to fatalities and severe property damage/destruction in the case an accident occurs.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Barbara Braun
13609 SE 43rd Place
Bellevue WA 98006

Bedwell, Heidi

From: Barbara Braun <bbraun@stratery.com>
Sent: Saturday, March 17, 2018 6:33 AM
To: Bedwell, Heidi
Cc: Barbara Braun
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
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3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Barbara Braun
13609 SE 43rd Place, Bellevue WA 98006

Bedwell, Heidi

From: Don Ray <donray31@hotmail.com>
Sent: Friday, March 16, 2018 4:46 PM
To: Bedwell, Heidi
Subject: Don Ray Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

As a former nuclear power plant operator I can tell you PSE has never properly justified the CURRENT need for this expensive expansion.

As a former president of a local software firm, I feel this PSE expansion is a business manipulation for profits and not in the long term financial interest of us rate payers.

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,

Donald Ray

134 130th Ave NE

Bellevue 98005

Bedwell, Heidi

From: Kristi Weir <khweir@hotmail.com>
Sent: Thursday, March 15, 2018 8:52 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds. PSE has not provided evidence that we actually need this big increase in energy capacity. Demand has been relatively stable despite increases in population and jobs.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees. Also PSE relies on fossil based fuels for 60% of its energy production which adds to GHG's.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. PSE has admitted it project will not increase reliability.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Kristina H Weir
4639 133rd Ave SE
Bellevue WA 98006

Bedwell, Heidi

From: Jodi <jodidg@comcast.net>
Sent: Wednesday, March 14, 2018 5:49 PM
To: Bedwell, Heidi
Subject: party of record

Please make me a party of record for the PSE permit process for Bellevue South and North. When there were hearings about the sale of PSE to foreign investors, I was very opposed to this sale and this is exactly why. It is evident, very evident, that this is a money grab by PSE for the investors. Though my views are not impacted by this project, I have been following it closely and read a great deal about it. I've also read numerous articles in the Wall St Journal and elsewhere about battery options that are presently being used elsewhere in the country and battery technology is rapidly improving. This has not been adequately explored or considered. I strongly believe there is no need for this project and that there are much better solutions for any issues the City of Bellevue might encounter in the future with regards to electricity. This project is wrong and I hope that the City of Bellevue has the integrity to stop it now.

Jodi Gable
jodidg@comcast.net
5700 143rd PL SE
Bellevue, WA 98006

Bedwell, Heidi

From: William Picatti <William.Picatti@natus.com>
Sent: Wednesday, March 14, 2018 8:59 AM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because the data that PSE has provided is faulty in oh so many ways. The use of winter-time load factors combined with summer-time derating factors is but one example. Combine the use of faulty information with the lack of acceptance of updated usage / demand numbers and new technologies, and this request doesn't make sense. This proposed project is way too expensive and potentially hazardous to the environment and the people that live near the proposed new line.

Please, do not support the PSE proposal for this new, dangerous transmission line!

Best regards,
Bill Picatti
5245 Highland Drive
Bellevue, WA. 98006

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Bedwell, Heidi

From: Kitti Kaiboriboon <kkaibori@outlook.com>
Sent: Wednesday, March 14, 2018 9:22 AM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell:

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is **unnecessary and wasteful of ratepayer funds**.
2. It is **risky** to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It **damages communities and the environment** by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Kitti Kaiboriboon
13553 NE 54th Pl
Bellevue, WA 98005

Sent from my iPhone

Bedwell, Heidi

From: Jessica Erskine <erskine.jessica@gmail.com>
Sent: Tuesday, March 13, 2018 1:57 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Jessica Erskine
1861 140th ave SE
Bellevue, WA 98005

Bedwell, Heidi

From: Ingrid Turner <iturner64@hotmail.com>
Sent: Tuesday, March 13, 2018 7:56 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Ingrid Turner
12512 SE 52nd St.
Bellevue, Wa 98006

Sent from my iPad

Bedwell, Heidi

From: Kathy Judkins <kathyjud46@icloud.com>
Sent: Tuesday, March 13, 2018 9:38 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.
5. For me personally this project will place a huge steel pole in my yard within a few feet of my garage and the Olympic Pipeline. My driveway will be damaged as well as the private access road to my home and 7 neighbors homes. This road is the only access to my home. During the project I will have no automobile access to my home. I am 72 years old and a widow and have a congenital back issue so will not be able to climb up many stairs to get to my house. Also a tree over 50 years old will be cut down.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Kathy Judkins
4324-136th PI SE
Bellevue, WA 98006-2237

Sent from my iPhone

Bedwell, Heidi

From: Sirisha Dontireddy <dontireddysirisha@gmail.com>
Sent: Tuesday, March 13, 2018 11:18 AM
To: Bedwell, Heidi
Subject: Energize Eastside

Hello,

I would like to be party of record for CUP and CALUP applications. My name is Sirisha Dontireddy and my address is 4617 135th PL SE, Bellevue, WA 98006.

I have serious concerns regarding PSE's Enegeize Eastside project.

1. Safety concerns: Energize Eastside's proximity to ageing Olympic pipeline. This is earthquake prone area and having high powered transmission lines so close to the pipeline can be disastrous.
2. Impact on my property: Not many people would want to buy a home that's close to high transmission power lines because of the exposure high levels of EMFs.
3. Views: Somerset neighborhood is cherished for its breathtaking views. These very tall, huge powerlines will totally dice the view up.

Thank you for your consideration!

Sirisha Dontireddy.

Sent from my iPad

Bedwell, Heidi

From: Ralph Rossi M.D. <ralph.rossi@Polyclinic.com>
Sent: Tuesday, March 13, 2018 7:36 AM
To: Bedwell, Heidi
Subject: Party of record

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I would like to be a party of record, opposing PSE's planned power line expansion in Bellevue.

Thank you
Ralph a Rossi, MD, MPH
5933 149th ave SE
Bellevue, WA 98006

Bedwell, Heidi

From: Don Marsh <donmarsh@cense.org>
Sent: Tuesday, March 13, 2018 8:00 PM
To: Bedwell, Heidi
Subject: CENSE comments on Energize Eastside
Attachments: CENSE comments on Energize Eastside.pdf

Dear Ms. Bedwell,

Please read the attached letter which lists some of the reasons CENSE objects to Puget Sound Energy's "Energize Eastside" project for which the City is currently considering permits to build in Bellevue.

Please keep us informed of all issues and developments related to this project.

Sincerely,

Don Marsh, President
CENSE.org



Coalition of Eastside Neighborhoods
for Sensible Energy

March 13, 2018

Heidi M. Bedwell
Environmental Planning Manager
450 110th Ave NE
Bellevue, WA 98004

Dear Ms. Bedwell,

The purpose of this letter is to express concerns CENSE has with Puget Sound Energy's applications for a Conditional Use Permit and a Critical Areas Land Use Permit to construct a new 230kV to 115kV substation at Richards Creek and replace 18 miles of 115kV transmission lines between Renton and Redmond with 230kV lines.

CENSE objects to PSE's project because:

1. PSE's data does not substantiate the need for the project. Therefore, the project is not a prudent investment of ratepayer dollars.
2. PSE's study of the safety risks posed by embedding 67 large-diameter power poles within feet of half-century-old pressurized petroleum pipelines is based on flawed assumptions.
3. PSE's evaluation of less-costly technologies available to enhance the reliability and resiliency of the Eastside power grid is inadequate.
4. The removal of thousands of valuable urban trees would damage communities and the environment.

CENSE will submit additional comments at a later date.

Sincerely,

A handwritten signature in black ink that reads "Don Marsh".

Don Marsh, President
CENSE.org

Bedwell, Heidi

From: Richard Kaner <drkaner@live.com>
Sent: Monday, March 12, 2018 8:56 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Rick Kaner
6025 Hazelwood Lane SE
Bellevue, WA 98006

Sent from my iPhone

Bedwell, Heidi

From: Jarvis Bowers <jarvis.bowers@comcast.net>
Sent: Monday, March 12, 2018 9:06 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
2. I'm concerned about noise pollution from the new power lines.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
Jarvis Bowers
13609 NE 28th Street, Bellevue WA 98005

Bedwell, Heidi

From: Sue Stronk <ssbuds@comcast.net>
Sent: Monday, March 12, 2018 9:42 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,

Sue Stronk
12917 SE 86th Place
Newcastle, WA 98056

Bedwell, Heidi

From: CW Saw <cwsaw@live.com> on behalf of CW Saw <cwsaw@comcast.net>
Sent: Sunday, March 11, 2018 11:44 AM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Heidi Bedwell – Environmental Planning Manager
450 110th Ave NE
Bellevue, WA 98004

Dear Ms. Bedwell,

As a concerned citizen of Bellevue, I am writing to ask that the city NOT approve PSE's permit application to build high-voltage transmission lines for its Energize Eastside project that will cut through our neighborhoods and schools, and gravely endanger us all.

As has already been argued countless times in public meetings on this issue, this project is unnecessary and a waste of ratepayer funds. It was undertaken primarily for the purposes of generating a financial return for the utility's investors.

Furthermore, it is risky to install tall power poles within feet of two half-century-old petroleum pipelines. A section of PSE's preferred alignment for the new poles will cut right through Tye Middle School, which my child attends. Why would the city government, which is supposed to represent the interests of its citizens, even consider putting staff and students at risk for a project which brings little benefit to the community? Not to mention the damage that this blight on the landscape will bring to our communities and the environment by removing thousands of valuable urban trees. After all, aren't we supposed to be a "City in a Park"?

There are far less costly ways to enhance the reliability and resiliency of the Eastside power grid. I would urge you to take the concerns of Bellevue citizens seriously and accordingly reject PSE's Energize Eastside permit application. Let's all work together to find real solutions that are more in line with our values as a city.

Sincerely,
Chit Saw
13809 SE 51st Place, Bellevue, WA 98006

Bedwell, Heidi

From: Russell Borgmann <rborgmann@hotmail.com>
Sent: Saturday, March 10, 2018 12:46 PM
To: Bedwell, Heidi
Cc: Russell Borgmann
Subject: Energize Eastside: Permit Application Comments/Questions
Attachments: Energize Eastside Permit Questions 2018-03-09.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Heidi,

Attached are additional comments on the Conditional Use Permit Application PSE has submitted to the City of Bellevue for their proposed Energize Eastside project. These comments are not duplicative of previous submittals. Please include these questions and comments as part of the public record for PSE's permit application.

Please confirm receipt of these comments. And please let me know if you have any questions.

Best Regards,
Russell Borgmann
2100 120th Place SE
Bellevue, WA 98005
cell: 425.445.4298
rborgmann@hotmail.com

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?

There is no functional utility for “half” of a transmission line. Bellevue Code 20.20.255, focuses on the **need** for the facility as well as its contribution to **reliability**. LUC 20.220.255.2.c.i requires PSE to “describe whether the electrical utility facility is a consequence of needs or demands from customers located with the district or area”. Even if it’s taken at face value that Energize Eastside is needed to support load growth in Bellevue (a *highly* disputed claim), it is clear that the installation of the “South Segment” is NOT a consequence of needs or demands from customers located along the “South Segment”. How can project construction begin without obtaining permits for the *entire* project? You can’t get a permit to lay a building foundation *on faith* that the rest of the building will eventually be permitted. The project must be considered, **and permitted, in totality**. Bifurcating the project and seeking first to obtain permits for the orphaned “South Segment” places undue coercion on decision-makers to also approve permits on the “North Segment”, even though those permit applications have not been submitted or available for review. If the “North Segment” violates BMC 20.20.255, Energize Eastside would be a “bridge to nowhere”. It is evident that PSE is manipulating the hearing process for its own benefit.

Bifurcating the permitting process invalidates the current DEIS. At over 800 pages, the current DEIS never disclosed this approach. Why? 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. At the very minimum, a Supplemental EIS is required. The City of Bellevue must defer further review of PSE’s application for the “South Segment” until applications have been received for ALL route segments.

Questions

1. What are the risks associated with splitting this project?
2. How will the project work and function if only one-half is built?
3. What happens if one segment encounters permitting problems?
4. What new Olympic pipeline risks are incurred when operating half of a transmission line?
5. How would an incomplete transmission line increase reliability to customers?

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 minimum distance advised (not dictated) in the LUC. 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. The Energize Eastside project guarantees one

thing: 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 relic-from-the-past for the next 40 years.

Remember how long it took to pay off “WHOOPS” (WPPSS)? The parallels are strikingly similar. In the 1970s and early 1980’s the Washington Public power Supply System became a failed utility project which brought about the second largest municipal bond default (\$2.3 billion) in U.S. history. Planners expected the demand for electricity to double every 10 years. Clearly that forecast was wrong. Let’s not repeat the mistakes of history with an unnecessary transmission line project that will cost customers more than one billion dollars over the next forty years.

<https://www.investopedia.com/ask/answers/09/wpps-municipal-bond-default-whoops.asp>

<http://www.historylink.org/File/5482>

<http://www.context.org/iclib/ic07/myers/>

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.

Late-Breaking Info: The FEIS was just released on March 1, 2018. At over 4,000 pages, the City of Bellevue must provide sufficient time for a thorough review. It is unfair to allow PSE to prepare for hearings with full knowledge that the contents of the FEIS will not have been comprehensively reviewed by the general public. The City of Bellevue **MUST** increase the time period for public comments on the Permit Application, so that the FEIS can be reviewed and appropriate comments/questions are raised.

Questions

1. How will the City of Bellevue address inadequate Public Notice?
2. What steps will the City take to increase public awareness and provide adequate Public Notice to residents and require PSE to notify ALL affected customers?
3. How will the City of Bellevue justify the short review period provided for the Application Permit, given that a 4,000+ page FEIS was just provided to the general public on March 1, 2018? To add insult to injury, the City is charging \$275 to obtain a copy.

- 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/) 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 21st century solutions (Battery Storage, Demand Response, Non-Wire Alternatives – NWA) to keep electricity rates at the “Lowest Reasonable 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 the DEIS 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?
3. Where is a comprehensive, up-to-date analysis of Battery Storage to satisfy the Eastside’s future electricity needs? Where is the comprehensive comparative analysis between NWA’s and Energize Eastside?

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 the DEIS to provide evidence that other viable alternatives exist and are currently in-use throughout the U.S. The DEIS 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 DEIS 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 Sr. Program 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 DEIS 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 published a recent 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 DEIS. 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.

“The basic argument for energy storage T&D (transmission & distribution) deferral is straightforward. Because an array of batteries can be more accurately scaled to meet growing demand, a relatively small battery installation could be used instead of investing in a transmission line upgrade that would have to be oversized to meet demand projections years in the future...Unlike most grid infrastructure, energy storage can be deployed in small, modular increments sited to serve growing demand with limited risk of oversizing or creating stranded assets.”

<https://www.utilitydive.com/news/storage-for-td-deferral-works-aps-finds-in-tonto-national-forest/511485/>

PSE has a sticky issue: New technology solutions (like grid battery storage) are more attractive and cost effective for the community, but less profitable for PSE’s bottom line. There is an opportunity for PSE to compromise: Although PSE has not proven or technically justified the need for Energize Eastside, PSE could provide a scalable battery storage project to allay unfounded concerns about “rolling blackouts”.

If, in the distant future, the need does materialize for Wired Alternatives, other less impactful alternatives are available 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, “Lowest Reasonable Cost” 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 44 acres of forested land and strip 109 acres of native vegetation (DEIS 4.5.3.1.3 and 11.6.3.5.1). 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 26th 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

PSE's preferred route for Energize Eastside will result in the destruction of between 5,000-to-7,000 mature trees and other crucial vegetation, according to PSE's own Community Advisory Group (CAG) **Evaluation Data Table 6/4/2014**, "Willow" route. 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. Have you ever wondered why the Renton/Kent Valley is more "hazy" than Bellevue? The **Real Time Air Quality Index Map** tells the story. Lack of tree canopy, combined with a plethora of high voltage transmission lines are major contributors.

http://www.ci.bellevue.wa.us/pdf/Manager/Urban_Ecosystem_Analysis.pdf
<http://aqicn.org/map/washington/#@e/47.3581/-121.8576/10z>

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. DEIS Table 4-1 (from California Climate Action Registry) shows that CO2 sequestration for forested land is 111 metric tons of CO2 sequestered per acre. Scrub vegetation sequesters 14.3 metric tons of CO2/acre. (44 forested acres x 111 metric tons of CO2/acre) + (109 scrub vegetation acres x 14.3 metric tons of CO2/acre) = **6442.7 metric tons of CO2 that will not be sequestered per year.** This does not account for GHG emissions that occur during construction (operation of heavy equipment). This will result in the **escalating Puget Sound carbon dioxide levels by over 14 MILLION pounds per year.** That is the equivalent of burning an additional 725,000 gallons of gasoline **per year.** With vehicles averaging approximately 25miles/gallon, that is the equivalent of driving an additional 18 MILLION miles per year. It will take MANY, MANY years for young plants 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. Energize Eastside poses a triple environmental threat to our region's tree canopy:

1. Energize Eastside increases greenhouse gas emissions by stripping the region of mature vegetation, so less carbon emissions are sequestered – over 14 MILLION pounds **per year**
2. Young saplings will not generate and emit nearly as much oxygen, until they mature – requiring SEVERAL DECADES. Until then Energize Eastside will result in the loss of over 1 MILLION pounds of oxygen emissions **per year**.
3. Energize Eastside transmission lines will generate corona, which is proven to attract airborne particles and further increase pollution in the region

The permit application from PSE only briefly touches on this loss. PSE avoids a detailed analysis of the destruction of mature tree canopy – replacing 50-70ft fir trees with 15ft ornamental species and shrubs. *"The Energize Eastside Project would contribute to the trend of degradation directly by removing trees and altering available habitat conditions, and indirectly by continuing to supply energy to support a growing, developing region. Project mitigation would help to reduce cumulative impacts, but will not immediately replace all habitat lost. Replacing large significant trees with smaller planting-sized trees would not fully replace the habitat functions provided by the existing conditions."* (pg 52 South Bellevue Critical Areas Report, PSE's permit documentation).

The City owes its citizens a much more thorough analysis of the risks and hazards to the community.

Questions

1. How will the City justify building Energize Eastside, which violates Low Impact Development (LID) Principles enacted by City Ordinances? Specifically, how will the City respond to criticism that LID-protected tree canopy will be destroyed and require decades to recover? LID is about more than storm water management and slope retention.
2. Where are the **air quality analyses** in the permit application or DEIS? What will this transmission line do to air quality in the region during construction as well as during long-term (decades) of operation?
3. The permit application discusses steep slope retention and water management, but carefully avoids in-depth discussion of tree canopy and analysis of air quality. Why?
4. Appendix D (pg 172 South Bellevue Critical Areas Report) classifies about two thirds of the removed vegetation as "Permanent", "Conversion", or "Temporary Impact", where long-term recovery remains undefined. While PSE appears to have completed an inventory of vegetation loss, where is the analysis of the long-term impact of this vegetation loss, particularly as it relates to air quality in the region?
5. The DEIS 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?
6. Will poles up to 110 feet tall require flashing beacons to alert low flying private aircraft of tall aerial obstructions, especially in areas that cross I-90 or higher elevations like 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. That is the purpose of EFSEC. **Washington’s Energy Facility Site Evaluation Council (EFSEC) is the central siting authority to address difficult-to-site energy facilities, like transmission lines** – balancing the need for new energy facilities with the broad interests of the public. EFSEC has the technical capability to assess the need, safety, and environmental quality. EFSEC has the authority to supersede City Land Use Code and maintains independence in exercising its power, functions, and duties. EFSEC is the final authority. Why has PSE appealed to various City Councils and City Staff to permit this project, rather than appeal to EFSEC? Could it be that PSE knows their proposed Energize Eastside project may not pass muster with EFSEC, so PSE is taking their chances to “divide and conquer” by intimidating Renton, Newcastle, Bellevue, and Redmond city officials – anticipating that individual cities would not have the technical expertise or capacity to adequately assess need, purpose, and viable alternatives? It is evident that PSE is manipulating the permitting process to their benefit.

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 or qualify as 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 – not other jurisdictions. (DEIS pg 1-6) Which block loads? Why isn’t PSE publically disclosing block load shortages (if they exist) and anticipated block loads in their application?
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, instead of pressuring City Staff and City Councils on the Eastside?
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? The four jurisdictions need not fear a lawsuit from PSE. The City can legitimately argue that PSE has the option and recourse to appeal before EFSEC before seeking relief in court. The City of Bellevue is within its rights to require PSE to obtain a full analysis from EFSEC on the Energize Eastside project before issuance of permits.

Topic 7: Build Environment (EIS Element in SEPA not covered in EIS)

Many houses are closer than 110 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 may not be eligible for financing from certain lenders (FHA, etc.) and may have difficulty in obtaining/retaining homeowners' insurance policies.

Questions

1. 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?
2. What studies can the City provide to assure homeowners that they will continue to qualify for home lending and homeowner's insurance?

Topic 8: NEPA REVIEW

Bonneville Power Administration documentation (in addition to Memoranda of Agreement) states that Lakeside Transformer (Bellevue) 230kV activities fall under NEPA.

Mr. David 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 and PSE are 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 incentives (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. Obsolete state incentives make **transmission lines (not subject to competitive bid)** one of the most profitable infrastructure “investments” that PSE can make.

“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 Washington.

<http://meconsumers.com/wp-content/uploads/2013/02/Funding-Federal-Power-2013.pdf>

<http://www.wsj.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
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 was *better* than the WUTC goals for SAIDI (outage duration) and SAIFI (outage frequency). EXPONENT urged the City of Bellevue to retain on-staff electrical reliability expertise to independently analyze and assess future needs. The City still has not acted on that recommendation.

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 - assumptions layered on top of the Western Electric Coordinating Council (WECC) 2018 Base Case.

The **Quanta** Study 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 provides significant consulting services to PSE's parent owner, Macquarie – not exactly an independent voice.

The Quanta study started with the "WECC 2018 Base Case" and then added several critical assumptions that far exceed NERC reliability standards:

- sending 1,500 MEGA Watts to Canada (that's a LOT of power – enough to power most of British Columbia)
- temperatures below 23F
- 2 of 4 transformers offline
- at least 6 west-of-Cascade emergency generators owned by PSE, and 5 other non-PSE owned emergency generators– all simultaneously are taken OFFLINE

This extreme confluence of worst-case events stressed the Bulk Electrical System well beyond hypothetical NERC reliability limits. By imposing these additional 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.

I spoke with Keri Pravitz (PSE Community Projects Manager, Energize Eastside project) during the City/PSE presentation on 11/14/2017, and she told me that PSE used the WECC 2018 Base Case. When pressed about the additional assumptions that PSE layered on top of the WECC 2018 Base Case to justify the "need" for Energize Eastside, PSE had no reply. PSE merely stated that they must meet mandated federal regulations that "have recently changed". I pressed Ms. Pravitz for the precise NERC federal regulations that changed. I asked for "chapter and verse" of federal regulation that requires PSE to factor in such a dire confluence of events. Ms. Pravitz said she would get back in touch with me. I'm still waiting for PSE's response.

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 and/or running west-of-Cascade emergency generators).

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. The real failure here is PSE’s response. 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 (increasing the size of the transformer at Talbot Hill) rather 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. Why isn’t the City pressing PSE to provide documented evidence – NERC regulations “chapter and verse” - describing the precise federal requirements that PSE is required to meet?
4. Why isn’t the City pressing PSE to provide evidence of why PSE chose to include N-9 layered assumptions that overly stresses then entire Bulk Electric System (BES), instead of NERC-mandated N-2 requirements?
5. 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?
6. Quanta, U.S.E and Stantec (PSE 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 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?
7. 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?
8. How will the City of Bellevue ensure they are making the best long-term decisions for residents to provide reliable, “Lowest Reasonable Cost” electricity?

Topic 10: Corrective Action Plans, NERC Requirements

During the City/PSE presentation on 11/14/2017, and Ms. Keri Pravitz (PSE) said that more complex Corrective Action Plans (CAPs) would need to be implemented to avoid rolling blackouts. She also stated that PSE “must meet mandated federal regulations that more recently changed”.

From the statements above, the public was led to believe that PSE has already instituted CAPs to “keep the lights on”, and these CAPs were only going to become more involved and complex. Is this true? How many CAPs has PSE initiated in the last year? Last 5 years? Last 10 years?

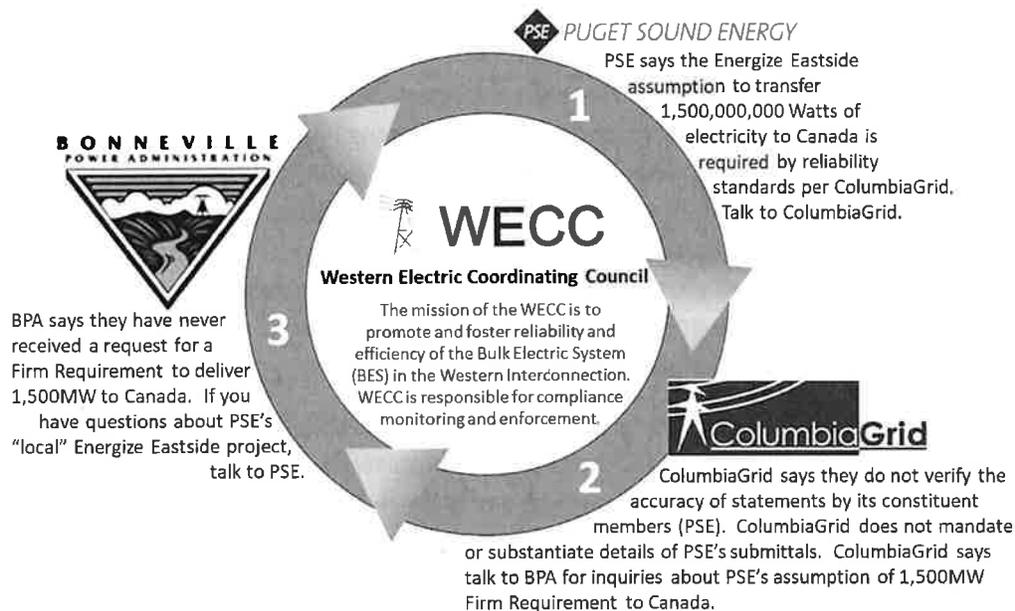
PSE stated they used the WECC 2018 Base Case. But why did they layer on a number of additional assumptions? PSE has led the public to believe that this is required by NERC to meet mandated federal regulations that have recently changed. Which specific regulations?

It appears that PSE has confused “Path Rating” with “Firm Requirement”. A Path Rating is set under favorable load and generation dispatch conditions. The Path Rating is the MAXIMUM amount of power that can be sent across the path. If less than favorable load and generation dispatch conditions occur, then the path is not allowed to carry that much power.

Firm Transmission is based on “Total Transmission Capability” (TTC). This is the amount of “Firm Transmission” that a utility can sell on a particular path.

PSE and ColumbiaGrid appear to have mistakenly equated “Path Rating” with “Firm Transmission”. That is a mistake in the **ColumbiaGrid 2013 System Assessment Report**. PSE says there is a “Firm Transmission Requirement” to supply 1,500MW of electricity to Canada under all conditions. This is in error. The Columbia River Treaty has a Path Rating of 1,350MW. Somehow PSE changed that Path Rating to a “Firm Requirement”. BPA is on record as saying there is NOT a Firm Requirement to deliver 1,500MW of electricity to Canada, and especially not under extreme peak load conditions. If that were the case, there would be public record of that Firm Requirement.

When quizzing PSE about the 1,500MW of electricity to Canada (one of six **Needs Assessment Report** key assumptions), PSE says that ColumbiaGrid requires it. When ColumbiaGrid was asked about this assumption, ColumbiaGrid states that do not mandate or substantiate the details of PSE’s submittals. ColumbiaGrid recommended talking to BPA. BPA says that have never received a Firm Requirement to delivery 1,500WM to Canada. If you have questions about PSE’s “local” Energize Eastside project, talk to PSE.



PSE is engaging in a circular argument, hoping that the public (and city officials) get lost or lose interest somewhere along the way.

Questions

1. Why isn't the City pressing PSE for details about Corrective Action Plans (CAPs) that PSE has already initiated? Has PSE resorted to any CAPs to keep the lights on? The City should report publically exactly what corrective actions (if any) PSE has already taken.
2. Which specific regulations (NERC Standards "chapter and verse") recently changed that require PSE to increase reliability from an N-2 scenario to an N-9 scenario? Why has PSE layered on assumptions about sending 1,500MW to Canada, simultaneous with weekday morning temperatures below 23F, simultaneous with 2 of 4 transformers offline, all while 6 west-of-Cascade emergency generators owned by PSE - and 5 other non-PSE owned emergency generators - are offline? Where is the NERC requirement mandating those assumptions? Specifically, what requirements recently changed that require all of these additional extreme assumptions to be layered upon the WECC 2018 Base Case?
3. Why isn't the City insisting on PSE to carefully distinguish between "Path Rating" and "Firm Requirement" for electricity transfers to Canada? Why isn't the City pressing PSE to re-run load flow studies without the additional layered assumptions on the WECC 2018 base case?
4. Why isn't the City pressing WECC for straight answers? Has anyone at the City reached out to WECC to get reliable data? Why isn't WECC holding PSE accountable?

Topic 11: Misleading Threats of "Rolling Blackouts"

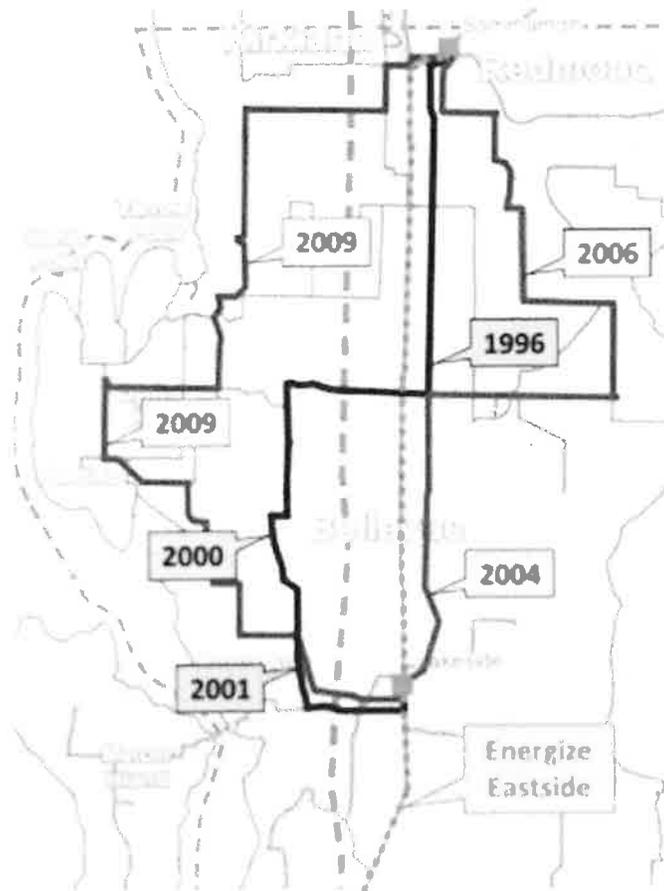
PSE's media campaign for Energize Eastside is designed around three themes:

1. Eastside growth is straining the electrical grid
2. PSE hasn't upgraded the "backbone" in over 50 years
3. If we don't act soon, the region could soon face planned rolling blackouts

Data from PSE and Seattle City Light proves that electricity demand is flat-to-declining, in the face of strong population growth and a booming economy (see Topic 12).

Our region's electrical grid is exactly that – A GRID. There is no longer a "backbone". Our region's transmission grid is a mesh - a "spider web" network with redundant paths - not a singular, centralized line subject to damage by accidents, storms, natural disasters, or attack. And that transmission GRID has been upgraded multiple times in the past 20 years, including recent upgrades in 2009. It is not true when PSE says they have not upgraded the transmission "backbone" in 50 years. PSE is required, at a minimum, to review and analyze the system every 2 years via the Integrated Resource Planning (IRP) process. PSE makes routine transmission upgrades and improvements. If they did not, PSE would be negligent in their regulated duty to provide reliable electricity to its customers.

"The backbone hasn't been upgraded in over 50 years" is a convenient sound bite, but a false argument. The map below shows the TRANSMISSION upgrades that PSE has completed on the Eastside in the last 20 years. Public Records with the City of Bellevue show that 3 of 5 North-South High Voltage Transmission Lines (HVTL) through Bellevue were built over time during the last 20 years. HVTL segments were added in 1996, 2000, 2001, 2004, 2006, and 2009. PSE has built 3 additional North-South high voltage transmission lines, increasing the Eastside's transmission capacity from 2 lines to 5 lines – a 250% increase in capacity – in the last 15 years.



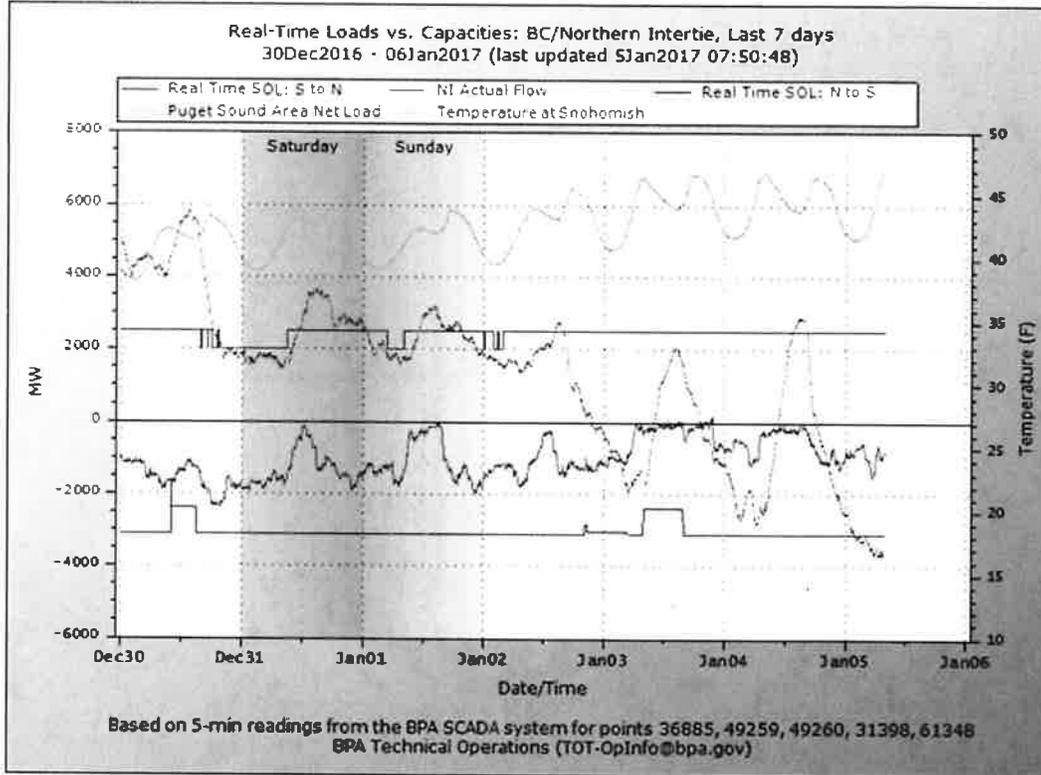
Finally, BPA has an automated system, installed and working since 2007, that prevents the region from experiencing rolling blackouts. BPA controls this, not PSE. A 2007 **BPA Factsheet** states:

“It is unlikely anyone’s lights will go out when the automated curtailment system is used. This is for a couple of reasons. For one, BPA will alert utilities in the affected area when the system looks as though a curtailment will be needed. All affected utilities need to know in order to shift some generation and transmission patterns to avoid the need for the curtailment. For another, once a curtailment is announced, the utilities have the same options of shifting generation or transmission to assure that they have sufficient energy.”

<https://www.bpa.gov/news/pubs/FactSheets/fs200709-BPA%20to%20automate%20transmission%20curtailment%20procedure%20for%20the%20Puget%20Sound%20Area.pdf>

BPA states that the Puget Sound will not experience rolling blackouts, because if need-be, BPA’s transmission planning (Day-Ahead and Hour-Ahead planning) would curtail power transfer to Canada during peak load events. Even during cold winter mornings, as recently as January 2017 (an unusually cold winter month), the U.S. was not curtailing power to Canada. In fact, over the past several years, electricity is flowing the other direction – from Canada to the U.S. Remember – Energize Eastside was first conceived of over 12 years ago, when power flows and the region’s energy landscape were far different than today’s reality. The real-time chart of electricity flow between the U.S. and Canada on the Northern Intertie is shown below:

Northern Intertie



This particular chart shows that early January 2017 cold snap. Even during those cold weekday mornings, the U.S. was not curtailing power to Canada. Electricity was flowing the OTHER direction – from Canada to the U.S. The red line indicates electricity flowing from Canada to the U.S., when it is below the zero axis (if the red line goes above the zero axis, it indicates power from the U.S. to Canada.). The green line shows the frigid temperatures experienced during that cold snap.

Looking at 15 years' worth of data, there doesn't appear to be a single example where large power flows to Canada coincided with unusually cold winter weekday mornings. Remember, two of PSE's key assumptions in the **Eastside Needs Assessment Report** that PSE uses to justify the need for Energize Eastside:

1. A cold (less than 23F) weekday morning (Monday through Friday, 5am to 9am)
2. 1,500MW of electricity flowing TO Canada from the U.S. simultaneously during those cold weekday mornings.

That situation does not exist. BPA and BC Hydro have altered power flows between the two countries, rendering Energize Eastside an obsolete project based on assumptions that no longer exist.

Questions

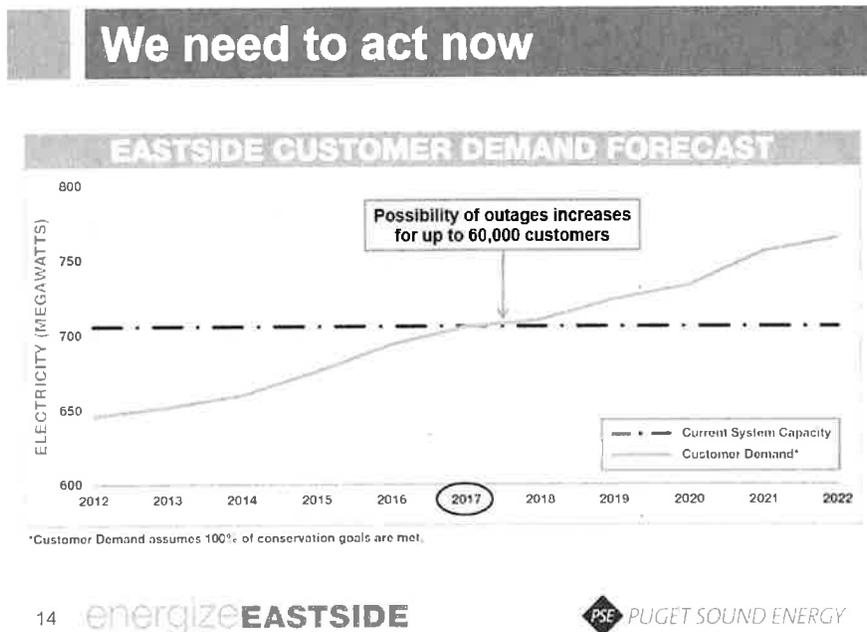
1. Why does the "backbone" - this particular existing PSE 115kV transmission line – need to be upgraded if we can live without it for 9 months at a time? Mr. Jens Nedrud (former PSE Senior Project Manager on Energize Eastside) stated that this existing line can be taken out of service for up to 9 months without grid ramifications.
2. Are there better ways to handle the other 3 months – periods of possible (not guaranteed) peak demand? Why isn't the City considering other less costly, less environmentally

damaging viable alternatives to provide the most reliable electricity at the lowest fair price to consumers?

3. Why isn't the City pressing PSE for the facts about BPA's automated curtailment system? How many times has BPA had to use this system in the last 5 years? Last 10 years? What has the trend looked like over the past 10 years? Is usage of this system over the last 10 years increasing or decreasing? Which way is power flowing during peak demand periods (cold weekday mornings below 23F) – from the U.S. to Canada, or **from Canada to the U.S.?**

Topic 12: Customer Demand Forecast and "Heat Map"

PSE claims that the Eastside suffers from a "transmission capacity deficiency". To communicate that problem, in 2014 PSE supplied this graph to illustrate their point:



From PSE's Energize Eastside CAG Presentation

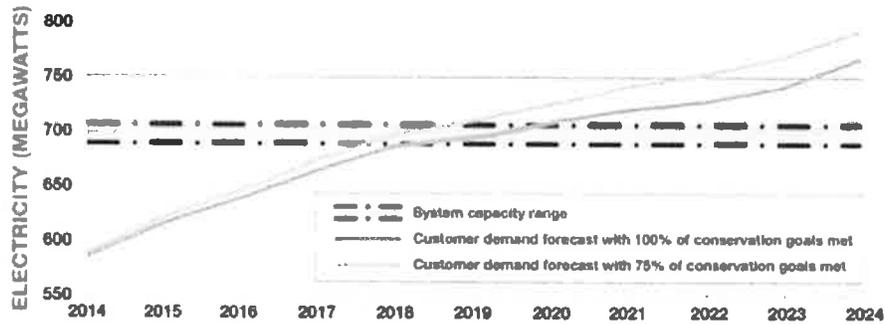
Jens Nedrud, PSE Energize Eastside Sr. Project Manager, **Winter 2014**

This graph showed a problem beginning in 2017. 2017 has now come and gone. **2017** had the coldest 3-month winter period in over 30 years. The Puget Sound Region did not experience rolling blackouts. During the City of Bellevue / PSE public presentation on November 14, 2017, Ms. Keri Pravitz (PSE) said that more complex Corrective Action Plans (CAPs) would need to be implemented to avoid rolling blackouts. The public was led to believe that PSE has already instituted CAPs to "keep the lights on", and these CAPs were only going to become more involved and complex. How many Corrective Action Plans (CAPs) has PSE had to resort to in order to keep the lights on? What corrective actions (if any) has PSE already taken?

<https://seattle.curbed.com/2017/3/2/14792542/seattle-coldest-winter-since-1985>

In 2016, PSE supplied an updated graph:

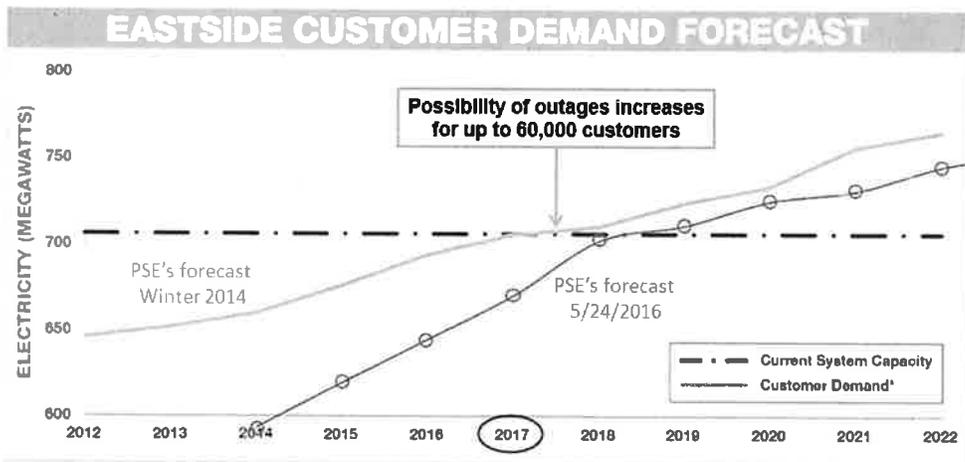
EASTSIDE CUSTOMER DEMAND FORECAST



From PSE's Energize Eastside website, 5/24/2016

At first glance, these two charts look similar. However, the scale was changed. When these two charts are superimposed on one another they yield the following:

We need to act now



*Customer Demand assumes 100% of conservation goals are met.

**Overlaying PSE's 5/24/2016 forecast (website)
Onto PSE's forecast provided to the CAG, Winter 2014**

Which forecast is accurate? The slope of the curve varies significantly.
Yet both curves indicate a problem in winter 2017-2018.
This suggests the slope of the curve has been significantly
manipulated to contrive a "NEED" to achieve PSE's desired result.

PSE's own data is contradictory. Their own data highlights PSE's grossly inaccurate forecasting models. Both curves above attempt to illustrate a problem in the winter of 2017-2018. But the slope of the

curves vary significantly. This clearly indicates the curves have been altered to contrive a need for PSE's proposed project. PSE has since removed these graphs from their Energize Eastside website.

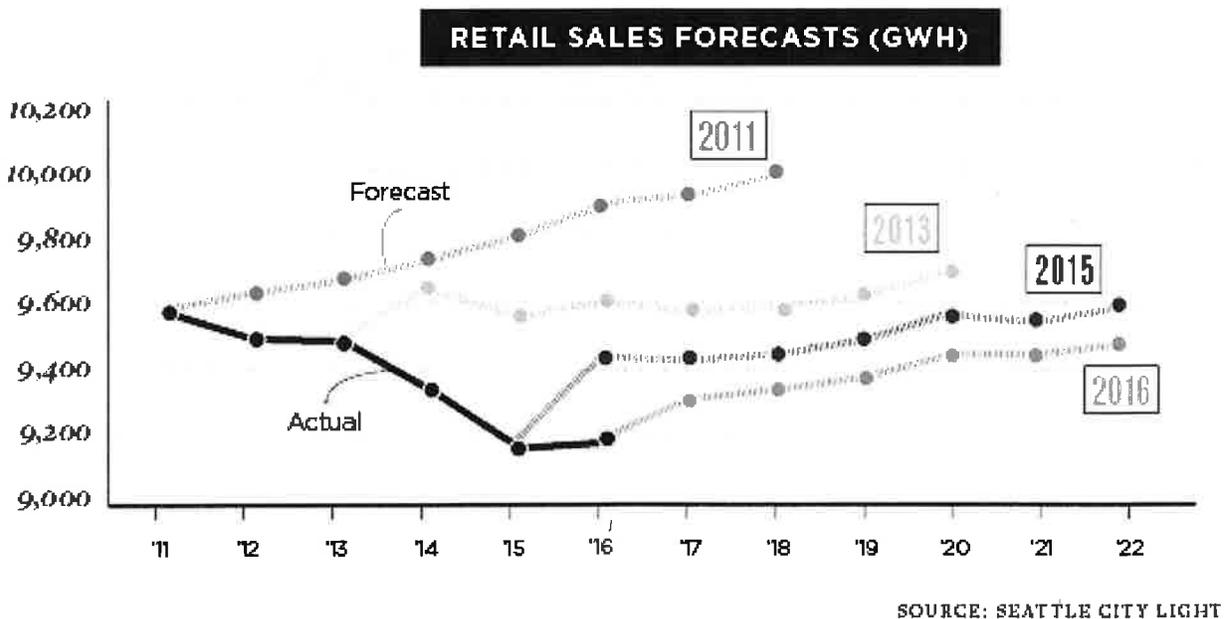
Comparing PSE's projected regional growth rate with other reputable forecasting agencies, we see:

Northwest Power and Conservation Council	0.4%
Seattle City Light	0.5%
Energy Information Administration	0.6% - 0.9%
Puget Sound Regional Council	1.2%
Sound Transit East Link Expansion	33% by 2040 = 1.3% per year
Puget Sound Energy	2.4%

PSE is required to send data to FERC. That data shows that PSE projects Eastside load growth at about 0.5% per year (in-line with SCL projections). Contrast that with PSE's public forecast, which forecasts growth of more than 2.4% per year. When dealing with the public and official decision-makers, PSE has inflated the projected growth rate over 5 TIMES that of Seattle, attempting to justify Energize Eastside.

The Eastside is NOT growing 5 TIMES faster than Seattle. Much of Bellevue's growth is energy-efficient new construction. Seattle has a higher number of older, less efficient buildings in need of retrofiting, as well as extensive new growth in South Lake Union. Yet despite Seattle's booming economy and population growth, Seattle City Light's forecasted electricity growth is 0.5% (recently revised *downward* to 0.1%). It stands to reason that SCL's peak demand growth would be *higher* than the Eastside.

Seattle City Light data shows just how inaccurate electricity forecasting is:



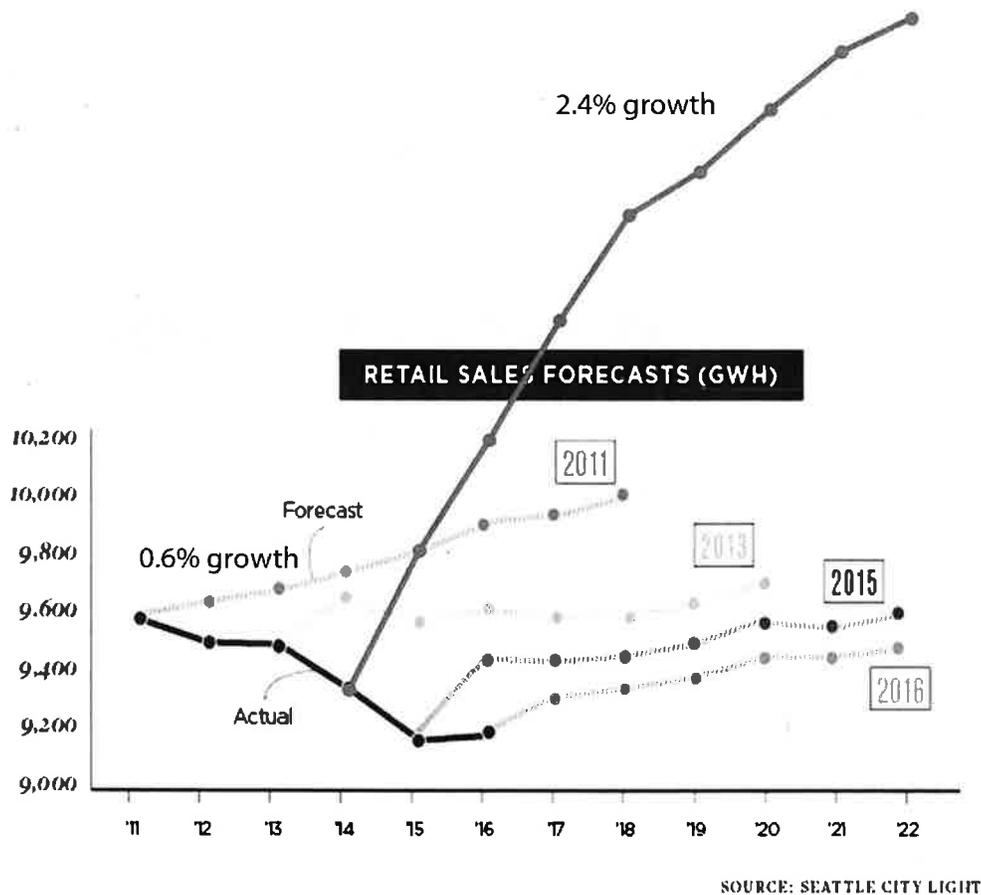
<http://www.seattlebusinessmag.com/policy/how-climate-change-conservation-and-renewable-energy-are-changing-seattle-city-light>

Each colored line shows a SCL forecast (2011, 2013, 2015 and 2016) trending up, while the dark black line shows the actual trend - downward. SCL's 2011 forecast for 2016 shows about 9,900GWH, while the actual was just 9,200GWH – a forecast that was off by 7.6%. Note that this data is during a time when Seattle has enjoyed a brisk, robust, booming economy, population growth, and building growth.

Bellevue was recently announced as a finalist for the Georgetown University Energy prize, a national competition of cities exhibiting environmental stewardship. Bellevue is one of the top 10 finalists in the U.S. for communities that have increased energy efficiencies, reduced carbon emissions, and saved on energy costs. *“Bellevue is among the highest performing communities in the competition based on total energy savings per household and in city facilities.”*

<https://www.bellevuereporter.com/news/bellevue-a-finalist-in-national-competition-for-energy-savings/>

Bellevue's national recognition of energy savings is another strong indicator that actual energy usage on the Eastside is flat-to-declining in the face of robust population growth and business development. PSE's IRP forecasts from 2013 to 2015 **DECLINED 11%**. PSE has demonstrated even more inaccurate electricity demand forecasts compared to SCL. The absurdity of PSE's forecast is best illustrated in the following graph, where PSE's 2015 IRP demand forecast of 2.4% is superimposed on the Seattle City Light graph:



Investor Owned Utilities (IOUs) face the imperative to make money for their investors. They can't make money selling electricity, because demand is stagnant. Instead IOUs seek to make money by earning a rate of return on infrastructure investments. The problem is, with stagnant demand, there is no need for new infrastructure. A drop in investment means a drop in profit. IOU investors can no longer count on steady growth from electricity demand. As a stop-gap, IOUs are jamming through marginal rate increases, so that despite decreasing electricity demand, customers are paying escalating electricity bills. IOUs are treading water, struggling to keep their heads above water while revenues dry up. Actual demand is flat-to-declining, yet year-after-year, IRP-after-IRP, utilities continue to over-forecast retail sales to justify building unnecessary infrastructure.

This data is further borne out by a study done by Lawrence Berkeley National Laboratory (LBNL) that analyzed load forecasting done by electric utilities via their Integrated Resource Planning (IRP) process. The intent of the IRP process to determine the least-cost-/risk supply and demand-side resources that can meet future obligations to customers. In the case of Investor Owned Utilities (IOUs), those obligations are skewed by the objectives of private equity shareholders. This independent quantitative study looked at IRP load forecast performance over TWO DECADES for 12 Western U.S. utilities, and explored how those IRPs influenced procurement decisions. **The findings show that resource procurement decisions are driven by other factors than customer load growth.**

This study's retrospective analysis of energy and peak demand forecasts against actual observed loads shows:

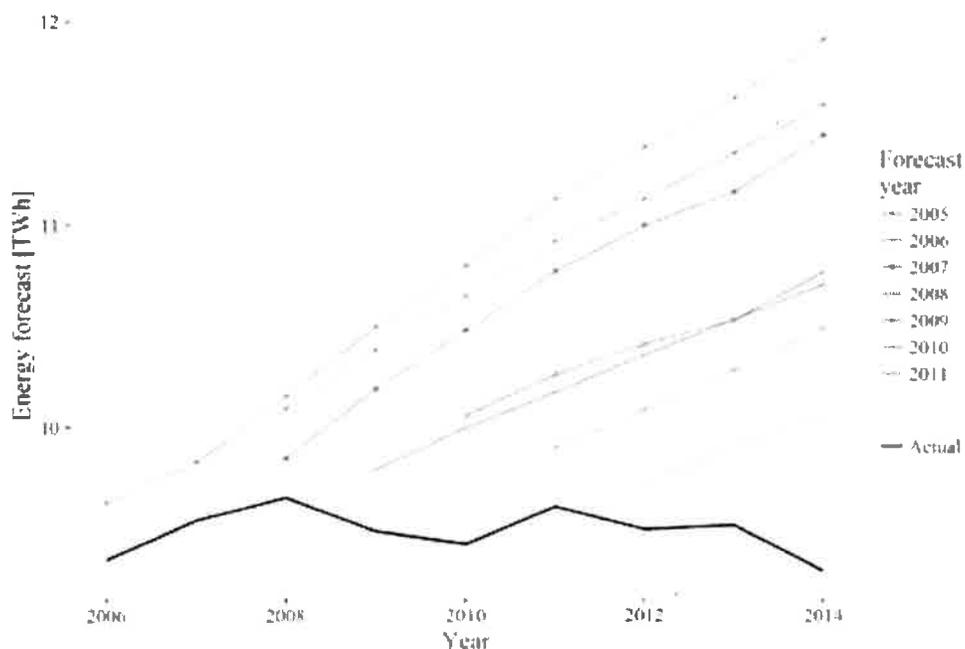


Figure ES-1 Load forecasts from seven subsequent IRPs and actual load for a Western U.S. utility.

Reference: *Load Forecasting in Electric Utility Integrated Resource Planning*, October 2016, Juan Pablo Carvallo, Peter H. Larsen, Alan H. Sanstad, Charles A. Goldman

At a minimum, the findings suggest that greater emphasis must be placed on strategies to manage uncertainties in load forecasts. For all the talk about utilities engaging in sophisticated econometric modeling to forecast customer demand, meteorologists do a better job of forecasting the weather than utilities do forecasting electricity demand. Utilities correctly forecast electricity demand about 11% of the time. This retrospective analysis shows that forecasting electricity demand could be more effectively obtained by means of flipping a coin, averaging closer to 50%. **Clearly other profit-driven motives of IOUs are at play.**

Power consumption in the U.S. (including the Puget Sound) has stalled in the last decade, breaking the link between electricity demand and economic / population growth. Utility revenue is declining, while utilities fixed costs are not. The utility business model is upside down. As a monopoly, PSE has resorted to gold-plated, unnecessary infrastructure to justify escalating electricity costs to customers. While demand is stagnant and the costs of generating electricity are also declining, PSE is faced with repeated ratepayer-increase requests to the WUTC to maintain their revenue. This bodes ill especially for PSE, since it is a private, foreign investor owned utility.

“Another strategy among the regulated utilities, which can earn a guaranteed return on capital investments they make, is to boost spending on their distribution grid. The cost of investments are passed onto customers.... Last year, electric utilities invested \$121 billion on infrastructure in the U.S., more than double the amount a decade ago, according to the Edison Electric Institute, the industry’s trade group in Washington.”

<https://www.bloomberg.com/news/articles/2017-04-25/u-s-power-demand-flatlined-years-ago-and-it-s-hurting-utilities>

PSE should seek and obtain EFSEC approval before moving forward with the proposed Energize Eastside project. Bellevue, acting as lead SEPA agency, should require PSE to obtain an analysis from EFSEC before granting any Conditional Use Permits for construction of this project.

Another illustration that PSE provides to justify their proposed project is the **“Electricity Heat Map”**. PSE’s ***Eastside Needs Assessment Report*** says this map represents “the most densely populated areas”.

There are clues that something is amiss with this map: Mercer Island is the same red color as downtown Bellevue. The rural Cougar Mountain region is orange and yellow. PSE declined to describe what data ranges were assigned to each color; however, the creative use of reds and yellows certainly give the perception of a critical situation that must be addressed urgently.

Questions

1. During 2017, how close did the Puget Sound Eastside come to experiencing rolling blackouts? How many CAPS did PSE implement to maintain electricity to the region?
2. Which PSE forecast is accurate? How accurate are any of PSE's forecasts? Why isn't the City pressing PSE for the past 10-to-12 years of historical data, so we can see the real trend line? Seattle City Light makes that data readily available to the public. PSE has denied public requests for that data.
3. Why isn't the City pressing PSE to provide realistic electricity growth rates for the region? Electricity growth rate is not the same as economic and population growth rates. The Federal Energy Information Administration (EIA) says, "...the long-run trend of slowing growth in electricity use relative to economic growth will continue: the rate of projected growth in electricity use will less than half the rate of economic growth..."
<http://www.eia.gov/todayinenergy/detail.cfm?id=10491>
4. What would possess PSE to create a "Heat Map" illustration that overly exaggerates a worst case scenario that could never possibly occur in real life?
5. Why isn't the City pressing PSE for an explanation of how PSE created this "Heat Map" graphic, and why is it included in PSE's **Eastside Needs Assessment Report**? This report provides crucial supporting documentation for PSE's permit application and the EIS. This report should not contain inaccurate or misleading information.
6. Why isn't the City requesting 10 years' worth of historical data on peak loads on each of Bellevue's 29 substations to verify the accuracy of PSE's statements? Where are those peak loads occurring? Which specific substations are experiencing peak loads? When did those peak loads occur? For how long did they last? How much above the substation transformer nameplate rating were those peaks? How would Energize Eastside specifically address those peak load events? How is the City independently verifying PSE's claims?

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/>

The City finds itself in a difficult dilemma:

1. The City must review the permit application PSE has submitted.
2. As a business - a privately held, investor-owned utility - PSE seeks to maximize revenue and profit for its investors, even at the expense of its captive customers. The WUTC has historically been toothless in rejecting rate increases proposed by PSE.

3. The City stands to reap significant revenue from substantial permit fees and construction charges & taxes from this massive Energize Eastside proposal. Should this proposal be considered over the costs to the residents of the City? There is a conflict of interests.
4. Obsolete state incentives make transmission lines (not subject to competitive bid) one of the most profitable infrastructure “investments” that PSE can make.
5. Better technological solutions (e.g. grid battery storage) are more attractive and cost-effective for the community, but less profitable for PSE’s bottom line.

These are all the more reason for PSE to appeal to EFSEC, rather than call upon the lack of expertise from City Staff and City Council to weigh these options. The City is ill-equipped to weigh the technical challenges and unable separate themselves from potential conflicts of interest.

These are the factors facing energy consumption today and into the future:

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. Public records from Seattle City Light confirm this reality
2. Energy efficiency and technology continue to grow and mature exponentially, far faster than risk-adverse utilities appear able to react. Australia just installed 100MW of grid battery storage
3. Customers are able to exert far more control over their electricity demand via IoT devices and appliances that we can schedule when to operate (reducing peak demand load). Customers are implementing energy conserving building materials and installing 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 37% of its power from coal-fired sources (PSE/Colstrip), and 60% of PSE’s electricity that comes from burning fossil fuel

Even though the Washington’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 (“Lowest Reasonable Cost” per WAC 480-100-238). **ENERGIZE EASTSIDE IS NOT THE ANSWER.** Energize Eastside is a project that was conceived of over a dozen years ago, a proposed solution to an anticipated problem that never fully materialized - a relic of past thinking. Energize Eastside’s excessive scale far exceeds any present or future need. Energize Eastside is deserving of technical scrutiny from EFSEC. Better solutions are available now. There are more safe, more reliable, less expensive alternatives. The City has a responsibility to its citizens to explore and implement those alternatives.

PSE is a private, foreign-owned monopoly that builds transmission infrastructure that is neither pre-reviewed or pre-approved by the WUTC, nor are transmission projects subject to competitive bid. PSE scarcely mentions transmission planning in the biennial Integrated Resource Plan, even though PSE is expressly required to do so per the Washington Administrative Code (WAC 480-100-238). The WUTC review PSE’s projects for prudence **after** they are built, not before, and the WUTC has never denied PSE a rate increase for transmission projects. In light of all of that, where are the protections for ratepayers? Where is the ability to regulate the “Lowest Reasonable Cost” for customers as required by State law?

For all of these reasons, and a myriad more, the answer is clear: the City must reject PSE’s incomplete, and misleading, permit application. The City must ask more questions of PSE. The City must require PSE to provide additional information in their permit application. **As a minimum mitigation, the City must require PSE to submit documentation from EFSEC clearly defining the need for Energize Eastside.**

Without an analysis from EFSEC, PSE's permit application is incomplete. The City must require additional information be included in the EIS and PSE's permits. Getting answers to the questions posed in this document is a good place to start.

Bedwell, Heidi

From: lakshmanok@gmail.com on behalf of Lakshmanan Valliappa <lak@vlakshman.com>
Sent: Saturday, March 10, 2018 11:24 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

I am writing to ask that Bellevue NOT approve PSE's application to build Energize Eastside because there are several less expensive ways to provide additional power without destroying thousands of valuable urban trees, increasing risk of petroleum leaks and being an eyesore.

I would like to be notified about public hearings.

Sincerely,
Valliappa Lakshmanan
4552 Somerset Dr SE
Bellevue WA 98006

Bedwell, Heidi

From: Shirley Souder <sasouder@hotmail.com>
Sent: Saturday, March 10, 2018 2:16 PM
To: Bedwell, Heidi
Subject: Party of Record

Follow Up Flag: Follow up
Flag Status: Flagged

From:
Charles and Shirley Souder
4417 Somerset Drive SE
Bellevue, WA 98006

Send your name and address to Heidi Bedwell, hbedwell@bellevuewa.gov to be a party of record, as stated in the notice at bottom of this page.

This will preserve your right to file an appeal later if so desired and it will let the City know you do not want the City to approve the PSE application.

This impacts my property; concerns about safety during construction around pipelines; the insufficient proven need for this project; the inadequate evaluation of non wired alternatives such as battery storage or demand response techniques; or the inappropriate placement of industrial sized poles and transmission wires.

Two points in the Bellevue Land Use Code back this up:

1. a project must protect single family neighborhoods from encroachment by more intense uses, and
2. design must be compatible with intended character of the property and the immediate vicinity.

- **During the Permit Review Process**

As explained above, the land use process typically takes between six and nine months. During this time, comments are welcome throughout the review process and will be accepted up until staff prepares their recommendation to the hearing examiner. 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 and CALUP applications. Staff will not make a recommendation on the CUP or a decision on the CALUP until after the Final EIS has been released. FEIS available March 1, 2018.

Bedwell, Heidi

From: DeEtta Simmons <deetta@uw.edu>
Sent: Saturday, March 10, 2018 12:26 PM
To: Bedwell, Heidi
Subject: Re: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Please disregard, sent in error.

On Fri, Mar 9, 2018, 10:57 PM DeEtta Simmons <deetta@uw.edu> wrote:

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
[YOUR NAME]
[YOUR ADDRESS]

Bedwell, Heidi

From: David Scott <dgscott_ret@comcast.net>
Sent: Saturday, March 10, 2018 5:03 PM
To: Bedwell, Heidi
Subject: Party of Record

Follow Up Flag: Follow up
Flag Status: Flagged

David & Sherron Scott

4539 Somerset Dr.S.E.Bellevue Wa. 98006

The above address , our home is situated in close proximity to the gas pipeline on the west and downhill side of the line. We have strong concerns relative to the safety in regards to any intrusion of the environment adjacent to the existing lines by the addition of the proposed power transmission lines.

Bedwell, Heidi

From: marcia LeVeque <marcialeveque@comcast.net>
Sent: Saturday, March 10, 2018 8:13 AM
To: Bedwell, Heidi
Subject: PSE project

Follow Up Flag: Follow up
Flag Status: Flagged

Heidi,

I'm against PSE getting approval for their Energize Eastside project. Current studies have shown that there is insufficient need for this project. The large poles and transmissions lines do not belong in our beautiful neighborhoods. I believe battery storage is an idea that should be addressed. Many other cities are already doing this. Our area is very progressive and I feel the current Energize Eastside project is definitely a step backwards.

Thank you,

Marcia LeVeque

3625 Lake Washington Blvd N

Renton, WA 98056

Bedwell, Heidi

From: Bob Moore <bmooreii@comcast.net>
Sent: Saturday, March 10, 2018 10:51 AM
To: Bedwell, Heidi
Subject: PSE Energize Eastside

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Heidi,

Something is terribly wrong in our community. How is it that a foreign-owned utility can construct a billion dollar project in the middle of our city to expand electrical transmission capacity at a time when ***demand is declining and safer, cheaper and more environmentally friendly alternatives are available?*** This is a backward move that industrializes our neighborhoods and costs our citizens billions of dollars for the benefit of foreign investors. This is not consistent with the vision the City Council members such as Conrad Lee articulate to our citizens. (See the Bellevue City Council Newsletter) There is a huge disconnect. I hope our political leaders and regulators will step up and challenge this albatross.

W. Robert Moore
4707 135th Place SE
Bellevue, WA 98006

Bedwell, Heidi

From: ROGER ORTH <rkorth@comcast.net>
Sent: Friday, March 09, 2018 9:23 PM
To: Bedwell, Heidi
Subject: PSE Energize Eastside Project

Follow Up Flag: Follow up
Flag Status: Flagged

Please list me as a **party of record** against the project. There is inadequate need to cause such a blight on the neighborhood.

Roger & Karen Orth

4530 Somerset Drive SE

Bellevue, WA 98006

Bedwell, Heidi

From: Clair Voetberg <cjvoetberg@outlook.com>
Sent: Friday, March 09, 2018 12:29 PM
To: Bedwell, Heidi
Subject: Proposed PSE project, Energize East Side

Follow Up Flag: Follow up
Flag Status: Flagged

Dear H Bedwell, I am writing you to register my protest to the permitting of this project. Completion of this unnecessary project will significantly ruin the views I now enjoy on Somerset hill it will diminish the value of my property.

Clair J Voetberg
4544 Somerset Place SE
Bellevue, WA 98006

Maxine Voetberg
4544 Somerset Place SE
Bellevue, WA 98006

Sent from [Mail](#) for Windows 10

Bedwell, Heidi

From: DeEtta Simmons <deetta@uw.edu>
Sent: Friday, March 09, 2018 10:57 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,
[YOUR NAME]
[YOUR ADDRESS]

Bedwell, Heidi

From: Dave Mickelson <DaveMickelson@comcast.net>
Sent: Friday, March 09, 2018 3:25 PM
To: Bedwell, Heidi
Cc: 'Denise Mickelson'
Subject: Party of Record - Energyize Eastside

Follow Up Flag: Follow up
Flag Status: Flagged

Please add my wife & I to **Party of Record** for Energize Eastside.

We strongly oppose the City approving the PSE application. PSE provided inadequate evaluation of non-wired alternatives.

~~~~~  
***Dave & Denise Mickelson***  
*(425) 829-8483*  
*DaveMickelson@comcast.net*

*4518 Somerset Drive SE*  
*Bellevue, WA 98006-3062*

## Bedwell, Heidi

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**From:** Carol at Aramburu-Eustis <carol@aramburu-eustis.com>  
**Sent:** Friday, March 09, 2018 12:58 PM  
**To:** Bedwell, Heidi; Brennan, Mike  
**Cc:** Rick Aramburu  
**Subject:** Letter re PSE EE  
**Attachments:** 2018-3-9 Bellevue-permit bifurcation.pdf; 2018-1-17 CENSE re PSE Segmentation.pdf; 2018-1-17 Att2 2018-1-9 Bedwell (FEIS).pdf; 2018-1-17 Att1 2017-8-31 re bifurc.pdf; 2017-8-31 CENSE comment re bifurcation.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please see Mr. Aramburu's letter of today's date, with two previous comments attached.

--  
Carol Cohoe  
Secretary / Legal Assistant  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue, SUITE 2000  
Seattle, WA 98104  
(206) 625-9515  
As of June 1, 2013 we are in SUITE 2000.  
This message may be protected by the attorney-client and/or work product  
privilege. If you received this message in error please notify us and  
destroy the message. Thank you.

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

J. Richard Aramburu  
rick@aramburu-eustis.com  
Jeffrey M. Eustis  
eustis@aramburu-eustis.com

720 Third Avenue, Suite 2000  
Seattle, WA 98104  
Tel 206.625.9515  
Fax 206.682.1376  
www.aramburu-eustis.com

March 9, 2018

Heidi M. Bedwell  
Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue WA 98009-9012

Via Email:  
HBedwell@bellevuewa.gov

Mike Brennan  
Director of Development Services  
City of Bellevue  
PO Box 90012  
Bellevue WA 98009-9012

Via Email:  
MBrennan@bellevuewa.gov

Re: Segmentation of Proposed PSE Transmission in City of Bellevue

Dear Ms. Bedwell and Mr. Brennan:

On August 31, 2017 and January 17, 2018, I wrote to the city on behalf of CENSE concerning permitting for PSE's transmission line project through Bellevue. This correspondence objected to PSE's proposal to divide their project into two parts for permitting in the City of Bellevue. Copies of my letters are attached hereto for your ready reference.

As our previous correspondence described, this transmission line project, 9 miles of which is in the City of Bellevue, has always been considered a single project for environmental review and permitting. However, PSE has now filed a permit application for just the southern segment of the proposal (to the Lakeside substation) and is holding off on the application for the northern segment.

Your response to our correspondence, in an email dated January 30, 2018, provided no substantive response to our concerns about PSE's segmentation of the project, but did provide us with a date for the issuance of the FEIS for this proposal.

The FEIS has now been issued, a lengthy document consisting of nearly 5,000 pages.

Public Comments are still being received by Bellevue. Given the size of the document, clearly the public will require additional time for permit review. However, a cursory review of the FEIS indicates no substantial justification for the arbitrary division of the project into two parts for review. Indeed, we have just received (March 6, 2018) the "Notice of Availability of Final Environmental Impact Statement" which describes 16-18 miles of electrical transmission lines, but gives no indication that this proposal will be segmented for permitting. Certainly the section on alternatives does not discuss building just one part of the project.

We understand that the potential construction of this linear facility will involve beginning at one place and staging construction in a sequential and continuous manner. However, this is distinct from the permitting of the facility, where there is no independent utility of construction of half the line. This is especially true under Bellevue's electrical utility facility in Section 20.20.255, when the code focuses on the need for the facility, its contribution to reliability and other systemic features. LUC 20.220.255.2.c.i requires the applicant to "describe whether the electrical utility facility is a consequence of needs or demands from customers located within the district or area." It is abundantly clear that the installation of the south segment is not a consequence of the residents near this line; the "need or demands," if any, are in downtown Bellevue and adjacent areas, which are in PSE's "north segment". Indeed, the Phase 1 DEIS did consider system need and alternatives, but never discussed the possibility of only building a part of the line.

In addition, are we to seriously believe that PSE would build the south segment and then stop at the Lakeside substation, at a cost of \$100,000,000+? Is it not the case that the approval of the south segment, with less impact than the entire eighteen mile line, will place substantial coercion on the Hearing Examiner and the City Council to approve the north segment? Won't the Hearing Examiner, the East Bellevue Community Council and the City Council have additional coercion placed on them to approve the north segment, even if it is violative of BMC 20.20.255, because it would cause PSE to waste considerable money on the south segment, which would then become a transmission line to nowhere?

In addition to the electric system issues, the proposed bifurcation poses procedural issues as well. These are discussed in our prior correspondence. Will the need for the project be determined in a proceeding on just the south segment of the facility, which does not connect to the north? Will the City be considering limiting the project to the south segment and determining no additional work will be permitted to the north? Is the staff seriously asking Bellevue residents to endure two sets of hearings, and two separate considerations by the City Council just to please PSE? Is this proposal an attempt to dilute opposition by separate consideration of segments north and south of the Lakeview substation? Because the proposal runs through the jurisdiction of the East Bellevue Community Council, and their approval of the conditional use permit is required, will review of the south segment be a Process I or Process III, the latter

required when EBCC has jurisdiction? The proposition to segment a single transmission line project into two parts makes no technical, electrical or procedural sense.

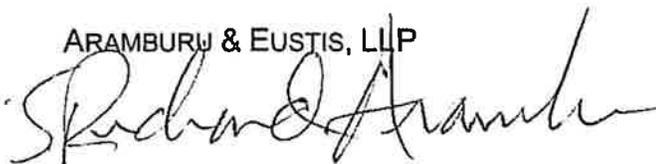
When the original bifurcation proposal was made by PSE, it indicated that the application for the northern segment would be submitted in later 2018. However, recent information from Carol Helland (an email of February 23, 2018) indicates that PSE anticipates the application for that segment will be made by late spring or early summer, less than three months away. Given these circumstances, no logical reason supports PSE's proposed segmentation into north and south segments. The delay of just a few weeks is a small part of the overall project consideration that stretches back to the fall of 2014.

The unfairness of PSE's proposed bifurcation cannot be remedied by later review by the Courts. It is incumbent on the staff to act now to assure that only a single hearing be held on this single project and the public interest be protected. A notice should be circulated to the community that review of the "Energize Eastside" proposal will be at a single hearing to be held following the submission of application materials for the entire project.

Because of the importance of this issue, we ask you to provide your response to this letter as soon as possible, but not later than March 16, 2018.

Sincerely,

ARAMBURU & EUSTIS, LLP

A handwritten signature in black ink, appearing to read "J. Richard Aramburu", written over the printed name below.

J. Richard Aramburu

JRA:cc  
cc: CENSE

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

J. Richard Aramburu  
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January 17, 2018

Carol Helland  
Development Services Land Use Director  
City of Bellevue  
P.O. Box 90012  
Bellevue 98009

Via Email:  
CHelland@BellevueWA.gov

Heidi Bedwell  
Energize Eastside EIS Program Manager  
450 110th Ave. NE  
P.O. Box 90012  
Bellevue, WA 98009

Via Email:  
HBedwell@bellevuewa.gov  
info@EnergizeEastsideEIS.org

Steve Osguthorpe, AICP  
Community Development Director  
City of NewCastle  
12835 Newcastle Way, Suite 200  
Newcastle, WA 98056

Via Email:  
SteveO@NewcastleWA.gov

Jennifer Henning  
Planning Director  
Renton City Hall  
1055 S. Grady Way  
Renton, WA 98057

Via Email:  
JHenning@RentonWA.gov

Re: PSE SEGMENTATION OF PROPOSED TRANSMISSION LINE ("ENERGIZE EASTSIDE") FOR REVIEW

Dear Mmes Helland, Bedwell, Henning and M. Osguthorpe,

As you know, I represent the Coalition of Eastside Neighbors for Sensible Energy (CENSE). CENSE has been an active participant in review and comment on PSE'S proposed eighteen mile 230 kV transmission line from the time the project was announced in December, 2013.

More recently, we corresponded with you in a letter dated August 31, 2017, regarding the proposed bifurcation of this project into several segments for purposes of review and permitting. That letter is attached for your ready review (Attachment 1). No response was received to this correspondence.

Within the past month, we inquired as to when the Final Environmental Impact Statement would be issued for the project; the City's lengthy email response is attached (Attachment 2). In that email, Ms. Bedwell indicated that the FEIS will likely be available on or about March 1, stating:

*Please note that we are in the active permit review phase (in both Bellevue and Newcastle), and I again encourage anyone who is interested in this project to focus their comments on the permit applications that have been submitted to the partner jurisdictions as well as the City of Bellevue.*

Later in the email is the following recommendation:

*In order to limit confusion, and because the comment period on the DEIS has long since passed, it is best to direct comments and review at this time to the permit application materials. The City recommends that interested parties submit comments on the permits early in the permitting process, rather than waiting to comment until after the FEIS is available. This of course does not preclude you or your clients from submitting additional comments at the public hearing on the permit applications.*

It appears that the City is pushing local residents to submit comments on permit applications, even before the FEIS is available. However, at this point the only complete application filed for the Energize Eastside project is for the "Bellevue South Segment," which is only 5 miles of the 18 mile project. No permits have been filed for the Bellevue Central Segment (3 to 5 miles), the Bellevue North Segment (2.2 miles), the Redmond Segment (2 miles) or the Renton Segment (4 miles). A permit application has been filed for the 1.5 mile Newcastle Segment, but the City has determined that permit application is incomplete and not ripe for comment.

As we described in our August 31 letter, there is nothing to indicate that functionally the "Energize Eastside" proposal is anything other than, as described in the DEIS's, a single project "to connect two existing bulk energy systems (one to the north in Redmond and one to the south in Renton), supply future electrical capacity and improve electrical grid reliability for Eastside communities." This is the second sentence on the first page of the Phase 2 DEIS and the subject of paragraph 2 on page 1-7 of the Phase I DEIS. Since the FEIS is not yet complete, the CENSE members and other interested members of the public do not know if this statement will be changed. Of course, Bellevue staff knows what will be in the FEIS because they, with PSE, are

writing the document.

As we stated in our earlier letter, there is no reason to proceed to staff review, have staff recommendations, a public hearing and City Council review on a single isolated segment (only 28%) of a larger system. Indeed, though PSE seems to say there is some independent utility to the South Bellevue segment, it does not connect to any substation. The Talbot Hill Substation, the southern substation mentioned in the DEIS, is at the end of the Renton Segment, four miles from Newcastle. As we noted above, no permit application has been filed in Renton.

CENSE members have directly asked PSE when there would be permit applications for the other segments of "Energize Eastside." In an email received from Keri Pravitz, PSE's "Community Projects Manager" on January 12, 2018, Ms. Pravitz states:

Thanks for the email. We will submit our Renton permit application soon and then North Bellevue and Redmond will follow.

With the additional permit applications coming "soon," there is no basis to proceed with permit review on the isolated, orphan South Bellevue Segment until applications have been filed for all other segments. This is especially true where that segment has no independent utility. In addition, in Bellevue, if the bifurcation and segmentation continue, CENSE and other local residents will be forced to attend two or more hearings on what is a single project.

We understand and appreciate that PSE may desire to construct the project in two different phases if permitted, but that is no reason to divide the review process for the project into two different segments.

In fact, it appears that PSE is deliberately attempting to manipulate the hearing process for its own benefit. As you are aware, the PSE proposal requires a conditional use permit under the code and compliance with the specific criteria for Electrical Utility Facilities under 20.20.255. Under BMC 20.35.015.B, a conditional use is a Process I decision which is a "quasi-judicial decision made by the Hearing Examiner." However, a conditional use decision becomes a Process III decision under BMC 20.35.015.D.2 for "projects subject to the jurisdiction of a Community Council pursuant to RCW 35.14.040; . . ." As you are aware, PSE's preferred route is through an area subject to the jurisdiction of the East Bellevue Community Council, thus requiring a Process III decision. In an email to CENSE from Carol Helland dated June 3, 2015, this distinction was fully recognized:

*EBCC jurisdiction has authority only to approve or disapprove applications within the jurisdiction of the Community Council. Refer to LUC section 20.35.365. The determination is made at the time of application. If PSE applies for a conditional use permit to approve an Energize Eastside*

*alignment that is located within the boundaries of the EBCC, then the application would be characterized as a Process III application. Refer to LUC 20.35.015.D.2. If PSE applies for a conditional use permit to approve an Energize Eastside alignment that is located outside the boundaries of the EBCC, then the application would be characterized as a Process I application. Refer to LUC 20.35.015.B.*

(Emphasis supplied). It is apparent that PSE's gambit is to segment the process so that this integrated project is reviewed under two different land use processes based on its own arbitrary and non-sensible division. PSE plainly intends to attempt gaining approval for the South Segment of the project and then using that approval to put pressure on EBCC in the next round of permit review, which will be Process III. As you know, EBCC has rejected other PSE projects in its jurisdiction.

Our August 31, 2017, letter indicated that the segmentation of this project is illegal and inconsistent with sound public process standards. This is especially true for a project that has been under review for four years, employing two separate Phase 1 and Phase 2 DEIS's with separate scoping, public hearings and comment periods for each.

In fact, the Phase 1 DEIS issued January 28, 2016, was a specifically a non-project document as described on page 1.1:

*This first phase assesses the comprehensive range of impacts and implications associated with broad options for addressing PSE's objectives, in a non-project or programmatic Environmental Impact Statement (EIS).*

(Emphasis in original.) Per the PSE website, there were 1,078 pages of comments on the scope of this document. There were more than 500 comments on the Phase 1 DEIS, including 26 different organizations. At no time in that document was there any discussion that there might be a segmentation of this project.

In addition, Ms. Bedwell's encouragement to start commenting on the project in advance of issuance of the FEIS is certainly an insult to those who have spent literally thousands of hours to assemble comments on two DEIS's and are still awaiting the responses to these comments two years later. The City's introductory letter at the beginning of the Phase 1 DEIS says: "The Final EIS will include responses to comments on both the Phase 1 Draft EIS and the Phase 2 Draft EIS." Under WAC 197-11-560, FEIS response to comments is required:

*The lead agency shall consider comments on the proposal and shall respond by one or more of the means listed below, including its response in the final statement. Possible responses are to:*

- (a) Modify alternatives including the proposed action.*
- (b) Develop and evaluate alternatives not previously given detailed consideration by the agency.*
- (c) Supplement, improve, or modify the analysis.*
- (d) Make factual corrections.*
- (e) Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency's response and, if appropriate, indicate those circumstances that would trigger agency reappraisal or further response.*

Even if it was appropriate to proceed to review the orphan South Segment, CENSE and other members of the public should be given full opportunity to review the FEIS and prepare input to the Hearing Examiner in Bellevue, and the other jurisdictions, based on its content. Keep in mind that more than two years was spent developing two DEIS's, both of which will be responded to in this FEIS. Please recall, early on we asked the City to prepare a single FEIS for each phase, but the City refused.

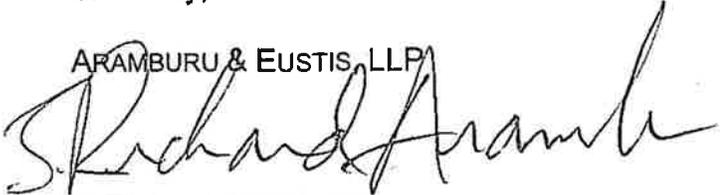
In summary, we request the City to take the following actions:

First, defer any further review of the application for the South Bellevue Segment until applications have been received for the other Bellevue segments as well as the Renton, Newcastle and Redmond segments.

Second, provide sufficient time for thorough review of the FEIS in advance of the public hearings. It is fundamentally unfair to allow PSE to prepare for the hearings with full knowledge of the content of the FEIS (indeed it is being written by the City and PSE) unless the public has the same privilege.

Thank you for your consideration of these comments. Because there was no answer to our attached letter of August 31, 2017, we request that you reply to today's comments no later than January 25, 2018. We look forward to your response.

Sincerely,

ARAMBURU & EUSTIS, LLP  
  
J. Richard Aramburu

JRA:cc  
cc: CENSE

## Rick Aramburu

---

**From:** HBedwell@bellevuewa.gov  
**Sent:** Tuesday, January 09, 2018 5:06 PM  
**To:** carol@aramburu-eustis.com; Rick@aramburu-eustis.com  
**Subject:** RE: ARAMBURU NON-DELIVERY - #2 - PSE Transmission Proposal.

Mr. Aramburu,

Thank you for your forwarded message. I do not have resolution from our IT department yet regarding an explanation for your undeliverable message. I can say we've been having a lot of network instability over the past several days and there may be some association with the instability and the reason for the email being undeliverable. I will update you on this issue when I have additional information to share. I assume you will confirm receipt of this message assuming you are able to receive it.

Regarding the remainder of your email, I can appreciate that your clients and other interested parties are anxious for the release of the FEIS. At this time we are anticipating a March 1<sup>st</sup> availability date. This assumes our final editing and production process goes as anticipated. However, the partner cities are still in the process of finalizing the FEIS, so this March 1<sup>st</sup> date may be subject to change.

Although I understand you and your clients are anxious to review the FEIS, please note that there is no additional comment period on the FEIS. As you are aware, the City provided copies of the DEIS, free of charge, in an effort to facilitate the DEIS commenting process. The City also extended the DEIS comment period, per your request, to provide additional time for public comment. The FEIS will contain responses to the comments submitted during the applicable time period, but there is no subsequent comment period on the FEIS itself. Once finalized, the FEIS will be issued and circulated as required by WAC 197-11-460(1). In the meantime, I would refer you to the DEIS, which remains publicly available, for the bulk of the substantive information that will be contained in the FEIS, and I appreciate your patience while the partner cities finalize the FEIS.

Many members of the CENSE community have expressed confusion regarding the two different processes that are currently underway, *i.e.*, the EIS process and the permitting process. Please note that we are in the active permit review phase (in both Bellevue and Newcastle), and I again encourage anyone who is interested in this project to focus their comments on the permit applications that have been submitted to the partner jurisdictions as well as the City of Bellevue. It bears repeating that the comment period for the DEIS is closed, and there is no subsequent comment period for the FEIS. Although the FEIS will be available for consideration by the partner cities as part of the permitting process, the FEIS is not a decision making document. It is one piece of information that decision makers, like the Director and Hearing Examiner at the City of Bellevue, will consider when making a decision on the subject permits. In order to limit confusion, and because the comment period on the DEIS has long since passed, it is best to direct comments and review at this time to the permit application materials. The City recommends that interested parties submit comments on the permits early in the permitting process, rather than waiting to comment until after the FEIS is available. This of course does not preclude you or your clients from submitting additional comments at the public hearing on the permit applications.

As I explained in previous communications to CENSE representatives, 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. Your email references 6 weeks between FEIS availability and a public hearing. However, that is not what my communication noted. Instead, I explained that the City anticipated 6 weeks between the FEIS availability and the Director's Recommendation and Notice of Public Hearing. Typically, the City provides notice three weeks in advance of the public hearing. Thus, we currently anticipate over two months between the date the FEIS will be available and the public hearing on the permit applications that PSE has submitted to the City.

|                                        |
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| CENSE Attachment 2<br>January 17, 2018 |
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Finally, if you have not done so I would recommend you sign up for alerts from the project permitting [page](#). Communication on the permit process will be available on this page in addition to the city's standard noticing procedures. Any questions you may have regarding the permit process in other jurisdictions should be directed to those specific jurisdictions.

Sincerely,



**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:** Carol at Aramburu-Eustis [mailto:carol@aramburu-eustis.com]

**Sent:** Tuesday, January 09, 2018 9:58 AM

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

**Cc:** Rick Aramburu <Rick@aramburu-eustis.com>

**Subject:** Re: ARAMBURU NON-DELIVERY - #2 - PSE Transmission Proposal.

Ms. Bedwell,

Rick has not received any response to his email below, forwarded to you (also for sharing with your IT person) last Friday.

Has a response been made?

Is there still a problem with Rick's email being rejected, or with you being able to send to that address?

---

Carol Cohoe  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue, SUITE 2000  
Seattle, WA 98104  
(206) 625-9515

As of June 1, 2013 we are in SUITE 2000.

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

On 2018-01-05 10:30, Carol at Aramburu-Eustis wrote:

Ms. Bedwell and IT, the original message Rick was trying to send (with the forwarding header deleted).

Carol Cohoe  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue, SUITE 2000  
Seattle, WA 98104  
(206) 625-9515

As of June 1, 2013 we are in SUITE 2000.

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

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**From:** Rick Aramburu [<mailto:rick@aramburu-eustis.com>]  
**Sent:** Thursday, January 04, 2018 1:31 PM  
**To:** 'HBedwell@bellevuewa.gov '  
**Cc:** 'Don Marsh' ([don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com))  
**Subject:** PSE Transmission Proposal.

Heidi:

Happy 2018 to you.

Can you give me a better idea when the FEIS on the PSE 240 kV transmission proposal might be issued? In the meantime, is there a draft that we can review?

I want to make sure that CENSE and other impacted citizens and communities have sufficient time to review the document and prepare for hearings on the project itself. Given the length of the prior DEISs, I anticipate the FEIS will be a substantial document. In a prior email you mentioned a period as short as six weeks from the time the FEIS is issued and hearings are held. Given the length of these proceedings and the anticipated length of the FEIS, six weeks will not be enough time to prepare for any hearings.

Thank you.

Rick

J. Richard Aramburu

ARAMBURU & EUSTIS, LLP

720 Third Avenue

Pacific Building Suite **2000**

Seattle, WA 98104-1860

Telephone (206) 625-9515

Facsimile (206) 682-1376

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and

destroy the message. Thank you ..

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

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August 31, 2017

Carol Helland  
Development Services Land Use Director  
City of Bellevue  
P.O. Box 90012  
Bellevue 98009

Via Email:  
CHelland@BellevueWA.gov

Steve Osguthorpe, AICP  
Community Development Director  
City of NewCastle  
12835 Newcastle Way, Suite 200  
Newcastle, WA 98056

Via Email:  
SteveO@NewcastleWA.gov

Jennifer Henning  
Planning Director  
Renton City Hall  
1055 S. Grady Way  
Renton, WA 98057

Via Email:  
JHenning@RentonWA.gov

Re: PSE Segmentation of Proposed Transmission line ("Energize Eastside");  
Need for Supplemental DEIS on New Transmission Proposal in Renton,  
Newcastle and Bellevue

Dear Ms. Helland, Mr. Osguthorpe, and Ms. Henning:

As you are aware from our extended correspondence, I represent the Coalition of Eastside Neighbors for Sensible Energy (CENSE). CENSE has registered their concerns in various forums over the past years concerning the 18-mile 230kv transmission line proposed by PSE, branded as part of its intensive public relations campaign as "Energize Eastside." The "Energize Eastside" project was launched in December 2013, almost four years ago.

To date, PSE has prepared two separate draft environmental impact statements (DEISs) on its proposal. CENSE has provided extensive public comment on these documents, orally at public hearings and in writing. The most recent comment period

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| CENSE Attachment 1<br>January 17, 2018 |
|----------------------------------------|

Mr. Johnny Harris  
Project 3018723  
August 31, 2017  
Page 2

on the Phase 2 DEIS ended on June 21, 2017, about two months ago. On the first page of that document (dated May 8, 2017), the “Energize Eastside” project was described as follows:

*The Energize Eastside project is a proposal to construct approximately 18 miles of new 230 Kilovolt (kV) electrical transmission lines and to add a new substation (Richards Creek) at the Lakeside substation in Bellevue to connect two existing bulk energy systems (one to the north in Redmond and one to the south in Renton), supply future electrical capacity and improve electrical grid reliability for Eastside communities.”*

The final environmental impact statement (FEIS) is, according to the “Energize Eastside” website, to be publicly available in early 2018. Pursuant to the SEPA rules, no hearings can proceed on any permit applications for this proposal until the FEIS is available.

During environmental review, the routing of PSE’s proposed transmission has always been considered a single project, albeit with routing options. The Phase I DEIS spent some fifty-four pages discussing project alternatives, but there was no discussion of segmenting the project for permitting or construction that would divide the project into a northern and southern component.

Recently, PSE has made major press releases advertising that it has chosen a route for the 18-mile transmission line, referenced by PSE as the “Willow Route,” although no actual permit applications have been received from PSE for this route. Permit applications would be required in Renton, Newcastle and Bellevue.

Given the background described above, CENSE members were surprised to read on the “Energize Eastside” website approximately three weeks ago the following:

*PSE will soon submit permit applications for the southern portion of the project. PSE’s plan is to build and energize the new Richards Creek substation in Bellevue and upgrade the transmission lines in south Bellevue, Newcastle, and Renton by summer 2018. We anticipate submitting permits for the northern portion later this year.*

*We need to build Energize Eastside in two construction phases to keep the backbone of the existing transmission system online and serving customers. By having the southern portion in service by next summer, we can avoid the need for rolling blackout plans. Once we’ve energized the southern portion of the project, we will begin work on the northern portion.*

From the foregoing, PSE indicates it will ask Bellevue, Newcastle and Renton to review and process separate permit applications for the southern segment of the project. It also says that by building the southern segment of the project, PSE “can avoid the need for rolling blackout plans.” As described above, this piecemealing of the proposal is entirely new.

For the reasons stated below, CENSE believes that separating this single project into two segments is inconsistent with applicable statutes, rules and regulations. Accordingly, we ask that Renton, Newcastle and Bellevue not accept separate applications for processing but insist on a single application and review for the entire 18-mile project. In addition, the statement that the southern portion will provide previously undisclosed benefits requires the preparation of a supplemental DEIS to discuss the segmenting proposal. The basis for our position is set forth below.

First, throughout the protracted SEPA process the proposal has been considered a single project. This was due in part to PSE statements in the first DEIS that the proposed transmission will be necessary to serve the Bellevue Central Business District and surrounding areas. Certainly there is no documentation that communities along PSE’s proposed southern segment are in need of additional transmission capacity. No alternatives were identified in either DEIS that would divide the project into two separate segments.

If the applicant now intends to divide the proposal into segments, that alternative must be considered in a supplemental EIS. If building the southern segment of the project separately really does “avoid the need for rolling blackout plans,” then that alternative should be considered in environmental review. Given the history of the review of this project, starting in December 2013, it is implausible that PSE would not have known of this course of action in May, 2017, when the Phase 2 DEIS was issued. This is the kind of new information about the project that requires a supplemental DEIS under WAC 197-11-405(4)(b),

Second, the bifurcation of the project is contrary to established land use and planning law. The impacts of the whole project must be considered in a single proceeding, lest the impacts of the whole are lost in an artificial division. Indeed, as the CENSE comments at various stages of the project have shown, the project as a whole lacks merit (and is a waste of public resources) because there is no need for it.

A single proposal needs a single public hearing and one review.

Third, bifurcating the process into north and south segments creates an unnecessary and wasteful review process. Interested citizens would be required to participate in two separate reviews for a single project. Local residents have already had to endure two

separate and duplicative SEPA draft environmental impact statement reviews. To extend this process further with PSE's plan to try to wear out concerned neighbors with separate and duplicative reviews is inappropriate to the cities' policies of engagement of local citizens in the land use review process.

Fourth, PSE's announced intention is to have permits issued for its proposed new "South Segment" in early 2018. However, according to its own website, the final environmental impact statement for the proposal will not be issued until early 2018. The SEPA Rules, in effect for more than thirty years, provide at WAC 197-11-655(2) that:

Relevant environmental documents, comments, and responses shall accompany proposals through existing agency review processes, as determined by agency practice and procedure, so that agency officials use them in making decisions.

See also SEPA itself, RCW 43.21C.030(2)(d) (the detailed statement shall accompany the proposal through the existing agency review processes). Accordingly, the review process for the South Segment, even if appropriate under the law, cannot begin until the cities have the FEIS available for review.

Fourth, it is apparent that the *raison d'être* for the bifurcation of the project is to avoid engaging the East Bellevue Community Council (EBCC) in decision-making for the whole project. As described in *Puget Sound Energy, Inc. v. East Bellevue Community Council*, 74464-0-1, 74465-8-1, Court of Appeals of Washington, Division 1, January 30, 2017 (Unpublished), EBCC has previously been critical of PSE transmission projects within its jurisdiction. By dividing its project into separate north and south segments, and proposing to proceed with the south segment first, PSE can avoid EBCC decision-making while it builds the south segment of the project. The cities should not permit this deliberate avoidance of permitting procedures requiring local community review of conditional use permits.

Washington law has been clear for many years that segmentation of a single project is not appropriate. In *Merkel v. Port of Brownsville*, 8 Wn.App. 844, 509 P.2d 390 (1973), the Court rejected the segmentation of a single project into shoreline and upland elements for approval. The court indicated:

There is nothing in the record before us to indicate that the contemplated construction has ever been anything but one project. The question, therefore, is whether the Port may take a single project and divide it into segments for purposes of SEPA and SMA approval.

8 Wn.App. at 850-51. Indeed, the Bellevue Municipal Code for "electrical utility

Mr. Johnny Harris  
Project 3018723  
August 31, 2017  
Page 5

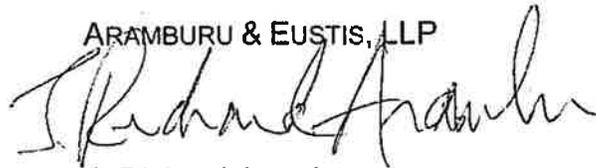
facilities" at BMC 20.20.225.E.4 requires that: "The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole . . ." (emphasis supplied). Separate review of an artificial north and south segment of the proposed 18-mile transmission line is not appropriate under the code.

In summary, PSE's announced intention to take its single project, long touted by it as necessary to address growth in downtown Bellevue and environs, and break it into two parts. Such a bifurcation is inconsistent with the prior extensive SEPA review, with local ordinances and with Washington caselaw and the cities should not accept piecemeal applications for the project. Further, given the utility promoted for the project to resolve "rolling blackouts" without addressing that issue in the two DEISs, a supplemental DEIS must be prepared to address, document and consider this new alternative. We ask Renton, Newcastle and Bellevue to decline to accept piecemeal permits for this project.

Thank you for your attention to this request. If you have any questions, please contact the undersigned.

Sincerely,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

JRA:cc

cc: CENSE  
Bellevue City Council  
Newcastle City Council  
Renton City Council

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

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rick@aramburu-eustis.com  
Jeffrey M. Eustis  
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www.aramburu-eustis.com

August 31, 2017

Carol Helland  
Development Services Land Use Director  
City of Bellevue  
P.O. Box 90012  
Bellevue 98009

Via Email:  
CHelland@BellevueWA.gov

Steve Osguthorpe, AICP  
Community Development Director  
City of NewCastle  
12835 Newcastle Way, Suite 200  
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Via Email:  
SteveO@NewcastleWA.gov

Jennifer Henning  
Planning Director  
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Renton, WA 98057

Via Email:  
JHenning@RentonWA.gov

Re: PSE Segmentation of Proposed Transmission line (“Energize Eastside”);  
Need for Supplemental DEIS on New Transmission Proposal in Renton,  
Newcastle and Bellevue

Dear Ms. Helland, Mr. Osguthorpe, and Ms. Henning:

As you are aware from our extended correspondence, I represent the Coalition of Eastside Neighbors for Sensible Energy (CENSE). CENSE has registered their concerns in various forums over the past years concerning the 18-mile 230kv transmission line proposed by PSE, branded as part of its intensive public relations campaign as “Energize Eastside.” The “Energize Eastside” project was launched in December 2013, almost four years ago.

To date, PSE has prepared two separate draft environmental impact statements (DEISs) on its proposal. CENSE has provided extensive public comment on these documents, orally at public hearings and in writing. The most recent comment period

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on the Phase 2 DEIS ended on June 21, 2017, about two months ago. On the first page of that document (dated May 8, 2017), the “Energize Eastside” project was described as follows:

*The Energize Eastside project is a proposal to construct approximately 18 miles of new 230 Kilovolt (kV) electrical transmission lines and to add a new substation (Richards Creek) at the Lakeside substation in Bellevue to connect two existing bulk energy systems (one to the north in Redmond and one to the south in Renton), supply future electrical capacity and improve electrical grid reliability for Eastside communities.”*

The final environmental impact statement (FEIS) is, according to the “Energize Eastside” website, to be publicly available in early 2018. Pursuant to the SEPA rules, no hearings can proceed on any permit applications for this proposal until the FEIS is available.

During environmental review, the routing of PSE’s proposed transmission has always been considered a single project, albeit with routing options. The Phase I DEIS spent some fifty-four pages discussing project alternatives, but there was no discussion of segmenting the project for permitting or construction that would divide the project into a northern and southern component.

Recently, PSE has made major press releases advertising that it has chosen a route for the 18-mile transmission line, referenced by PSE as the “Willow Route,” although no actual permit applications have been received from PSE for this route. Permit applications would be required in Renton, Newcastle and Bellevue.

Given the background described above, CENSE members were surprised to read on the “Energize Eastside” website approximately three weeks ago the following:

*PSE will soon submit permit applications for the southern portion of the project. PSE’s plan is to build and energize the new Richards Creek substation in Bellevue and upgrade the transmission lines in south Bellevue, Newcastle, and Renton by summer 2018. We anticipate submitting permits for the northern portion later this year.*

*We need to build Energize Eastside in two construction phases to keep the backbone of the existing transmission system online and serving customers. By having the southern portion in service by next summer, we can avoid the need for rolling blackout plans. Once we’ve energized the southern portion of the project, we will begin work on the northern portion.*

From the foregoing, PSE indicates it will ask Bellevue, Newcastle and Renton to review and process separate permit applications for the southern segment of the project. It also says that by building the southern segment of the project, PSE “can avoid the need for rolling blackout plans.” As described above, this piecemealing of the proposal is entirely new.

For the reasons stated below, CENSE believes that separating this single project into two segments is inconsistent with applicable statutes, rules and regulations. Accordingly, we ask that Renton, Newcastle and Bellevue not accept separate applications for processing but insist on a single application and review for the entire 18-mile project. In addition, the statement that the southern portion will provide previously undisclosed benefits requires the preparation of a supplemental DEIS to discuss the segmenting proposal. The basis for our position is set forth below.

First, throughout the protracted SEPA process the proposal has been considered a single project. This was due in part to PSE statements in the first DEIS that the proposed transmission will be necessary to serve the Bellevue Central Business District and surrounding areas. Certainly there is no documentation that communities along PSE’s proposed southern segment are in need of additional transmission capacity. No alternatives were identified in either DEIS that would divide the project into two separate segments.

If the applicant now intends to divide the proposal into segments, that alternative must be considered in a supplemental EIS. If building the southern segment of the project separately really does “avoid the need for rolling blackout plans,” then that alternative should be considered in environmental review. Given the history of the review of this project, starting in December 2013, it is implausible that PSE would not have known of this course of action in May, 2017, when the Phase 2 DEIS was issued. This is the kind of new information about the project that requires a supplemental DEIS under WAC 197-11-405(4)(b),

Second, the bifurcation of the project is contrary to established land use and planning law. The impacts of the whole project must be considered in a single proceeding, lest the impacts of the whole are lost in an artificial division. Indeed, as the CENSE comments at various stages of the project have shown, the project as a whole lacks merit (and is a waste of public resources) because there is no need for it.

A single proposal needs a single public hearing and one review.

Third, bifurcating the process into north and south segments creates an unnecessary and wasteful review process. Interested citizens would be required to participate in two separate reviews for a single project. Local residents have already had to endure two

separate and duplicative SEPA draft environmental impact statement reviews. To extend this process further with PSE's plan to try to wear out concerned neighbors with separate and duplicative reviews is inappropriate to the cities' policies of engagement of local citizens in the land use review process.

Fourth, PSE's announced intention is to have permits issued for its proposed new "South Segment" in early 2018. However, according to its own website, the final environmental impact statement for the proposal will not be issued until early 2018. The SEPA Rules, in effect for more than thirty years, provide at WAC 197-11-655(2) that:

Relevant environmental documents, comments, and responses shall accompany proposals through existing agency review processes, as determined by agency practice and procedure, so that agency officials use them in making decisions.

See also SEPA itself, RCW 43.21C.030(2)(d) (the detailed statement shall accompany the proposal through the existing agency review processes). Accordingly, the review process for the South Segment, even if appropriate under the law, cannot begin until the cities have the FEIS available for review.

Fourth, it is apparent that the *raison d'être* for the bifurcation of the project is to avoid engaging the East Bellevue Community Council (EBCC) in decision-making for the whole project. As described in *Puget Sound Energy, Inc. v. East Bellevue Community Council*, 74464-0-1, 74465-8-1, Court of Appeals of Washington, Division 1, January 30, 2017 (Unpublished), EBCC has previously been critical of PSE transmission projects within its jurisdiction. By dividing its project into separate north and south segments, and proposing to proceed with the south segment first, PSE can avoid EBCC decision-making while it builds the south segment of the project. The cities should not permit this deliberate avoidance of permitting procedures requiring local community review of conditional use permits.

Washington law has been clear for many years that segmentation of a single project is not appropriate. In *Merkel v. Port of Brownsville*, 8 Wn.App. 844, 509 P.2d 390 (1973), the Court rejected the segmentation of a single project into shoreline and upland elements for approval. The court indicated:

There is nothing in the record before us to indicate that the contemplated construction has ever been anything but one project. The question, therefore, is whether the Port may take a single project and divide it into segments for purposes of SEPA and SMA approval.

8 Wn.App. at 850-51. Indeed, the Bellevue Municipal Code for "electrical utility

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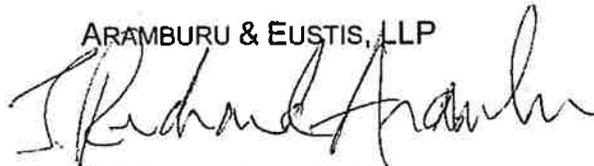
facilities" at BMC 20.20.225.E.4 requires that: "The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole . . ." (emphasis supplied). Separate review of an artificial north and south segment of the proposed 18-mile transmission line is not appropriate under the code.

In summary, PSE's announced intention to take its single project, long touted by it as necessary to address growth in downtown Bellevue and environs, and break it into two parts. Such a bifurcation is inconsistent with the prior extensive SEPA review, with local ordinances and with Washington caselaw and the cities should not accept piecemeal applications for the project. Further, given the utility promoted for the project to resolve "rolling blackouts" without addressing that issue in the two DEISs, a supplemental DEIS must be prepared to address, document and consider this new alternative. We ask Renton, Newcastle and Bellevue to decline to accept piecemeal permits for this project.

Thank you for your attention to this request. If you have any questions, please contact the undersigned.

Sincerely,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

JRA:cc

cc: CENSE  
Bellevue City Council  
Newcastle City Council  
Renton City Council

## Bedwell, Heidi

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**From:** Patrick Tien <penhotien@hotmail.com>  
**Sent:** Friday, March 09, 2018 11:48 AM  
**To:** Bedwell, Heidi  
**Cc:** kesayian@aol.com  
**Subject:** FW: Neighbor Update: PSE/EE Application: To Do THIS week.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Heidi,

Please put me/my feedback in the party of records for PSE/EE application;

Name: Pen-ho Patrick Tien  
Address: 4711 135<sup>th</sup> PL SE Bellevue, WA 98006-3034

Here are my comments:

1. The PSE project impacts on our property and make the whole area industrial looking.
2. I have a big concern about safety during construction around pipelines.
3. There is no insufficient proven need for this project.

Sincerely Yours,

Patrick Tien

## Bedwell, Heidi

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**From:** Pete Mansfield <petermansfield@comcast.net>  
**Sent:** Friday, March 09, 2018 12:07 PM  
**To:** Bedwell, Heidi  
**Subject:** Energize Eastside Permit Applications

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Heidi –

Please add my name as a party of record NOT in favor of the City of Bellevue granting a permit to PSE for any portion of their proposed Energize Eastside Project.

I do not believe they have made their case for the necessity of this project nor do I believe they have adequately evaluated alternative methods to meet peak electrical power demands.

Electrical energy delivery and distribution is in the process of being completely rethought on a national and international scale. It would be a mistake to allow, at this time, construction of additional high voltage power transmission lines and towers through our city. It is rapidly becoming old technology. I know we can do better. We are leaders after all.

Thank you!

Peter K. Mansfield, Ph.D.  
4568 Somerset Place, SE  
Bellevue, WA 98006  
425-246-1384  
[petermansfield@comcast.net](mailto:petermansfield@comcast.net)

## Bedwell, Heidi

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**From:** Kesayian <kesayian@aol.com>  
**Sent:** Friday, March 09, 2018 12:30 PM  
**To:** Bedwell, Heidi  
**Cc:** sesayian@aol.com  
**Subject:** Comment on PSE Application for Bellevue South

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Heidi,

Please record Sam and Karen Esayian , 4601 135th Ave SE, Bellevue, WA 98006,  
as party of record for comments on the PSE Bellevue South Application for Energize Eastside.

Our general concerns are for those also stated in the LUC for Bellevue: protecting single family neighborhoods from encroachment by more intense uses and the proposal to use a design that contradicts the intended character of a neighborhood. In addition, we have concerns about safety during construction adjacent to the pipelines and the inadequate evaluation of non wired alternatives.

Further comments will follow.

Thank you,  
Karen Esayian

4601 135th Ave SE  
Bellevue, WA 98006

## Bedwell, Heidi

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**From:** sue.dehmlow@comcast.net  
**Sent:** Thursday, March 08, 2018 9:21 AM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.
2. PSE is in the business of generating income to it's shareholders and doesn't have our interests at heart.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,

Sue Dehmlow  
1720 140<sup>th</sup> Ct SE Bellevue 87007

## Bedwell, Heidi

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**From:** Sean Cox <sean.ozel.cox@gmail.com>  
**Sent:** Thursday, March 08, 2018 11:51 AM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.
5. PSE and the EIS process have failed to address the risks of this project due to the potential death and damage that these new lines will cause during a major landslide or seismic event. Quoting we follow national standards does not address the fact that the additional height of the lines will result in them falling through a substantial number of homes due to the unique environment and risks we face in the PNW. PSE has a history of claiming it's an act of god and not being held responsible for past events which have resulted in damage to homes by their lines.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Sean Cox  
4538 Somerset Dr SE  
Bellevue, WA 98006

## Bedwell, Heidi

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**From:** Mindy Suurs <msuurs@gmail.com>  
**Sent:** Thursday, March 08, 2018 12:09 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Why would such a progressive, tech-oriented area (Eastside) use anything less than the newest, best, most environmentally friendly utilities? Why spend so much money and end up with an outdated eyesore result? Do NOT let the profit motive of this corporation (PSE) dictate this backward-thinking plan. There is no excuse – you can't say you didn't know better because PSE has turned a blind eye toward all the evidence from CENSE and others and wants to plow forward recklessly with their predetermined plan.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Mindy Suurs  
4662 144<sup>th</sup> PI SE  
Bellevue WA 98006

## Bedwell, Heidi

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**From:** Joan,Nolan <joansn64@hotmail.com>  
**Sent:** Thursday, March 08, 2018 4:30 PM  
**To:** Bedwell, Heidi  
**Subject:** Comment Submittal: File Number 17-120556-LB and17-1205657-LO  
**Attachments:** Energize comments fin.pdf

Hi Heidi,

Please accept our comments on Energize Eastside File Number 17-120556-LB and17-1205657-LO.

The original signed copy is being sent through the US mail to Development Services.

Thank you.

Joan and Robert Nolan  
4700 133rd Avenue SE  
Bellevue, WA 98006

City of Bellevue  
Development Services  
450 110<sup>th</sup> Avenue NE  
PO Box 90012  
Bellevue, WA 980009-9012  
March 8, 2018

RE: Comments  
Energize Eastside  
File Number 17-120556-LB and 17-120557-LO

Dear City of Bellevue Development Services:

Please accept these comments on Energize Eastside File Number 17-120556-LB and 17-120557-LO:

Stormwater comments - Richards Creek 230 kV Substation:

This is an industrial project site, with extensive use of galvanized materials containing zinc. The application incorrectly calls the entire site an “infrequently used maintenance access route”.

Minimum Requirement 5, onsite stormwater management is required and has not been satisfied.

Minimum Requirement 6, runoff treatment, requires enhanced treatment for metals. There is currently no treatment provided for this industrial site.

Minimum Requirement 7, flow control: There is no documentation of the detention vault sizing and function. The application must include a stormwater report that documents compliance with all minimum requirements and includes hydrologic modeling results for detention sizing and control structure. The lower half of the driveway / access road flows directly into the creek with no flow control, treatment or onsite stormwater management.

The substation fails to meet LUC 20.25H.080.A.3.

Wetland comments - Richards Creek 230 kV Substation:

This project requires a Section 404 permit and a Section 401 Water Quality Certification. Thresholds for Section 404 and 401 permitting require analysis of the entire project impacts, not just a partial phase in one municipality.

Wetland D hydrology is provided by overbank flooding from Stream C. The new culvert will eliminate overbank flooding of wetland D. Project must fully mitigate the loss of wetland D.

Project must complete a final mitigation report that includes mitigation goals, performance standards, monitoring and maintenance protocols, data sheets and rating forms, and contingencies for 5 year monitoring period.

This project would increase storm runoff, by cutting trees on the east side and channelizing flow around the project site, and concentrating this runoff into new channels that discharge into wetland A at the NW corner of the development and discharge into Wetland H at the SW corner. These concentrated flows have the potential to cause long-term erosion through these wetlands and exacerbate downstream sediment deposition.

The project would disrupt the hydrology of slope wetlands both upslope and downslope of the new stream channel. This project will create two upland berms running through the middle of Wetland A. Project is not adequately mitigating for these impacts. Project must include monitoring of the wetland area south west of the new stream channel.

Culvert and stream channel comments - Richards Creek 230 kV Substation:

This project's new Culvert and new stream channel require Hydraulic Project Approval (HPA ) and 401 Water Quality Certification permits.

The long-term impacts and disruption to existing wetlands and streams does not justify the bermed stream channel which would be disconnected from adjacent wetlands. The new culvert and stream channel would increase peak flows to downstream systems.

Proposed culvert has a sediment trap within the structure. This is an illegal structure. There is no plan or design for maintenance cleaning of sediment, which would dewater the creek and disrupt the aquatic life in the stream.

The culvert and stream relocation calls itself a Habitat Improvement Project as part of development of a utility facility. Instead of enhancing fish and wildlife habitat, it would disrupt existing ecosystem functions and create an unnatural bermed stream in the middle of wetland A, in the process cutting many mature trees.

The application states the channel would be regraded to assist in sediment transport. This project occurs at an abrupt transition in stream grade, from steep to shallow. The proposed stream relocation would extend the steeper section beyond the project development, facilitating sediment transport through the PSE site and allowing deposition of sediment to occur downstream, impacting downstream parcels.

The wetland and stream relocation would remove 43 mature alder trees with an average diameter over 10 inches and a maximum diameter of 18 inches. 22 poplar trees are proposed to be removed which are mostly clustered adjacent to the stream. Proposed mitigation for removal of 65 mature wetland trees is just 66 small two-gallon wetland trees, along with hundreds of shrubs and groundcover. In addition the project is planting 48 upland/buffer trees (2 gallon) in what was formerly wetland. Project is converting a forested wetland into a shrub dominated wetland bisected by upland berms. While there will be a net increase in the number of trees in the wetland/stream system, assuming all newly planted trees survive, the tree canopy will be greatly reduced for decades.

#### Forest Canopy losses - Richards Creek 230 kV Substation:

Besides the removal of 65 mature wetland trees as part of stream relocation, this project is proposing to remove 205 mature trees for project development, and the cutting (topping at 15' height) of 46 trees as part of a vegetation management area. The 205 trees removed include two 30" diameter maple trees and a 34" diameter fir tree. The 46 trees topped include 48" diameter and 30" diameter maple trees. There is no mitigation proposed to mitigate these impacts as part of the Richard Creek 230kV Substation project. This project fails to maintain existing tree canopy coverage, let alone meet targets.

There is no justification to top 46 mature trees in the vegetation management area. This area is not under any new or existing power lines.

#### Conceptual photo simulations:

The conceptual photos do not represent the project as applied for in the plan sheets.

Conceptual 30 shows 75' poles, plans show 85' to 100'.

Conceptual 38 shows 65' poles, plans show 70' to 80'.

Conceptual 39 shows 75' poles, plans show 72' to 82'.

Conceptual 40 shows 75' poles, plans show 76' to 95'.

Conceptual 18 shows 80' poles, plans show 82' to 90'.

Conceptual 15 shows 80' poles, plans show 82' to 90'.

#### New Monopoles comments:

The direct embed installations require site-specific geotechnical studies.

The foundation-style installations require engineered design drawings.

The foundation designs must be analyzed for seismic stability.

These new monopoles are proposed to be eighty to one hundred twenty-five feet tall, carrying multiple high-voltage lines under tension, which could land directly on residential houses and a middle school if the foundations should fail.

Please provide a profile view of the underground portion of each pole, in relation to the pipeline depth. Would foundations be deeper than the adjacent pipeline depth? How close to the pipeline both vertically and horizontally would these pole installations occur?

The Construction Scenarios presented in Appendix B of the plans do not have any scale. How wide would the access road be? Residents must be consulted to agree on the actual access route through backyards.

What mitigation is proposed for tree and shrub removal on resident's land? Installing a two-gallon tree to replace a full grown tree does not mitigate the long-term loss of shade, visual buffer, and noise reduction benefits we currently enjoy, let alone the fact that our pre-school child planted it so many years ago. The project should provide professional appraisal of all vegetation proposed to be disturbed and pay that cost to the land owner.

The Citizens Advisory groups have not been consulted on the choice of pole finish. This is an important consideration, both for the overall character of the neighborhood, and for residents who will have to look at individual poles intruding on their view outside their windows.

Plan sheet comments:

The plan sheets show only one existing pole location where existing pole structures are H-poles. Revise the sheets to show actual existing pole locations.

Sheet 5/25 shows a three new high tension lines over I-90, with three new poles and a new line headed east extending off the plan sheet. This new line is not part of the project proposal.

Overall project comments:

The project application is incomplete. There is inadequate analysis of project effects, including wetland impacts, stream impacts, stormwater management, and tree canopy targets. There is no wetland mitigation plan, no final culvert design, and no long-term stormwater management plan.

The project does not have required state and federal permits, including Section 404 permit, Section 401 Water Quality Certification, and Hydraulic Project Approval.

The design for pole foundations is completely lacking.

While it is acceptable to phase construction, the project must be permitted as a whole and complete project. The project as applied for does not have independent utility.

South Bellevue Critical Areas Report Puget Sound Energy – Energize Eastside Report, the Watershed Company August 2017:

Page 17 – 18 discusses salmon in South Bellevue streams and notes lamprey use only. This is inconsistent with the Watershed Company Report 2008 Spawner Survey Report which found Chinook salmon, Coho Salmon, and Cutthroat Trout use in Richards Creek and Coal Creek. Further the tributary that the Richards Road 230 kV substation is located on goes to Richards Creek. Richards Creek has Clean Water Act category 5 303(d) listing #70091 for bioassessment; this requires improved water quality conditions and the proposed stream reconfiguration proposed under the Energize project will likely act to reduce water quality.

Alternative Siting Analysis – Questions:

PSE states that the proposed Energize corridor was chosen after extensive study. How can this be when PSE has still not produced any evidence that it has considered EIS comments from at least 2016 onwards?

Why has PSE chosen a residential corridor rather than an industrial corridor for Energize? What will PSE do to mitigate the negative impact to the City of Bellevue view corridors?

Finally, thank you for addressing our comments in advance. We will look forward to hearing the City's response.

Sincerely,

Joan Nolan and Robert Nolan  
4700 133<sup>rd</sup> Avenue SE  
Bellevue, WA 98006

## Bedwell, Heidi

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**From:** Margaret Moore <mmooreii@comcast.net>  
**Sent:** Friday, March 09, 2018 11:48 AM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE Energize Eastside project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Heidi,

I would like to be listed as a party of record to preserve my right to file an appeal later if I so desire. We do not want the City of Bellevue to approve the PSE application as it is now configured. PSE must be required to consider alternative solutions to their perceived potential energy disruptions which are more up-to-date, environmentally relevant and less intrusive.

Two points in the Bellevue Land Use Code pertain to the current situation:

1. A project must protect single family neighborhoods from encroachment by more intense uses.
2. (The) design must be compatible with intended character of the property and the immediate vicinity.

Through the 18 mile length of the proposed power lines, both of these elements will be violated and must be considered by both PSE and the Bellevue City Council before any further action is taken.

Sincerely,  
Margaret R. Moore  
4707 135<sup>th</sup> PL SE  
Bellevue, WA 98006  
425-747-1388  
mmooreii@comcast.net

## Bedwell, Heidi

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**From:** Rachel <rachelsaw88@gmail.com>  
**Sent:** Thursday, March 08, 2018 7:51 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Rachel Saw  
13809 SE 51st Pl, Bellevue, WA 98006

## Bedwell, Heidi

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**From:** Rachel Ting <rachelting@gmail.com>  
**Sent:** Wednesday, March 07, 2018 11:09 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Rachel Ting  
13314 SE 44th Pl., Bellevue 98006

## Bedwell, Heidi

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**From:** L Tong <loan\_tong@hotmail.com>  
**Sent:** Wednesday, March 07, 2018 8:38 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Loan Tong  
13308 SE 44th Pl., Bellevue 98006

## Bedwell, Heidi

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**From:** Alice Evans <arbevans@frontier.com>  
**Sent:** Wednesday, March 07, 2018 2:35 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

PSE has misrepresented this project from day one—beginning by sending a post card stating that WHO listed exposure to EMF as not having a deleterious effect on the human body. In fact, at that time, WHO listed exposure to EMF as Category 2B—a possible human carcinogen. In addition to the reasons cited above, their project also will impact our health.

Sincerely,  
Alice Evans  
2455 127th Ave. NE  
Bellevue, WA 98005

## Bedwell, Heidi

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**From:** Dean <voiceguy1@comcast.net>  
**Sent:** Wednesday, March 07, 2018 10:10 AM  
**To:** Bedwell, Heidi

PLEASE....Don't let PSE get away with their costly, unnecessary, nature and neighborhood destroying Energize Eastside project. Don't let a foreign owned monopoly ruin our cities.

Dean Smith  
Bellevue, WA  
425-746-9078

## Bedwell, Heidi

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**From:** lisa@lisahazen.com  
**Sent:** Wednesday, March 07, 2018 2:01 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Lisa Hazen

Lisa Hazen Design + Editorial  
[www.lisahazen.com](http://www.lisahazen.com)

## Bedwell, Heidi

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**From:** Diana Melman <dianaza@hotmail.com>  
**Sent:** Wednesday, March 07, 2018 12:32 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

It bothers me that we are a world class city and yet the power lines in my neighborhood (New Port Hills) look like they will fall or come dangerously close to things bellow. I don't understand why we would spend more money on making our neighborhood even more insightly with larger power lines. I will never understand the need for it if we can invest that money and put the power lines in the ground. And I bet that there more people than I who would be willing to support this idea. Please don't force PSE's greedy investors interest on us who have to live with the consequence.

Please notify me when any Bellevue public hearing for this project is announced.

Grateful to you for your representation of our interest,  
Diana Melman  
6023 121st Ave SE  
Bellevue WA 98006

## Bedwell, Heidi

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**From:** J Wilson <jenniferwilson@outlook.com>  
**Sent:** Tuesday, March 06, 2018 2:36 PM  
**To:** Bedwell, Heidi  
**Subject:** Comments on PSE's Energize Eastside permit application

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

1. It is unnecessary and wasteful of ratepayer funds.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines, especially in such close proximity to schools, daycare facilities, and homes.
3. It damages communities and the environment by removing thousands of valuable urban trees.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Bellevue can and should join the 21st century on this!

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,

Jennifer Wilson

14312 SE 45th Street

Bellevue, WA 98006

## Bedwell, Heidi

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**From:** Pam Johnston <pamjjo@msn.com>  
**Sent:** Monday, March 05, 2018 9:27 AM  
**To:** Bedwell, Heidi  
**Subject:** Energize Eastside

Please add me as a party of record for Energize Eastside.

Thanks  
Pamela Johnston  
3741 122nd Ave NE,  
Bellevue, Washington 98005