

# Public Comments

## Pittman, Reilly

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**From:** John Pallett <john.pallett@saiea.com>  
**Sent:** Saturday, October 21, 2023 5:47 AM  
**To:** Pittman, Reilly  
**Subject:** Energize Eastside Project - a comment  
**Attachments:** Pallett etal 2022 Staggered towers on parallel powerlines.pdf

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Dear Reilly Pittman

I received an alert to your report on the Addendum for the Energize Eastside Project, which sparked my interest in bird collisions against transmission lines.

I have not had time to absorb the report thoroughly so maybe my input is off the mark. Anyway, I want to draw your attention to our finding that, where new lines or parallel lines are to be constructed, staggering of the towers can help to reduce bird collision rates. Our attached paper explains the concept, which is based on our observations in southern Africa that vertical structures are avoided by collision-prone birds such as cranes and bustards, and most collisions occur in the mid-span area between towers.

In your case, where you are replacing one line with a new one, an effective mitigation could be to leave the old poles standing, and to place the new poles in the mid-span between them. The poles in the mid-span section of the new line would help to prevent collisions in those sections. We are looking for examples of this concept to see whether the practical outcome is as good as the theory predicts.

I wanted to pass on this message just in case it could reduce further collisions. Please let me know if this suggestion is useful and whether it can be implemented.

Thanks and regards

John Pallett

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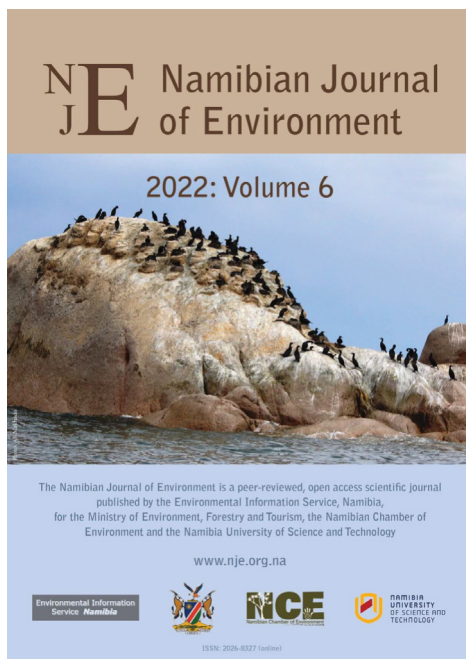
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## SECTION A: RESEARCH ARTICLES

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Cover photo: AB Makhado

## Staggered towers on parallel transmission lines: a new mitigation measure to reduce collisions of birds, especially bustards

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### ABSTRACT

Significant numbers of birds are killed annually by flying into power lines across Africa, and numerous attempts have been made to mark lines to make them more conspicuous, to reduce these collisions. Results from surveys reported in this paper and many others indicate that bustards (family Otidae) are most susceptible. Bustard fatalities are not greatly reduced by adding bird diverters to earth wires. Here we propose a new mitigation measure that may reduce the number of mortalities by two-thirds where two power lines run in parallel: staggered towers. Power line surveys in Namibia and South Africa indicate that 87% of 134 bird collisions occurred in and near the middle sections of a span, while only 13% of collisions occurred near the towers themselves. Despite the skull morphology of bustards creating a blind spot immediately ahead of them, it appears that the towers are big enough to be seen (or heard) and avoided. Thus, by aligning power lines of similar size in parallel and as close as technically feasible and staggering the towers such that each tower is aligned with the mid-span of the neighbouring line, the lines may become more visible. This should allow collision-prone birds to gain altitude and fly over the lines. Theoretically, this method is expected to reduce power line fatalities by 67% for each new line. We call for experimental validation of this novel mitigation measure.

**Keywords:** bird mortalities; Namibia; power lines; span position; South Africa

### INTRODUCTION

Power lines strung across the landscape inadvertently create problems for birds, through collisions, electrocutions and displacement from their preferred habitat (Bevanger 1998, Jenkins *et al.* 2010, Silva *et al.* 2010, Uddin *et al.* 2021). Collisions have been identified as particularly problematic for large birds, effectively making the power line grid a network of traps, running to tens of thousands of kilometres of lines in southern Africa alone. By 2007, South Africa's power utility Eskom had 27 770 km of high voltage transmission lines and 325 000 km of distribution lines (Eskom 2007), and in Namibia the current figure is 34 000 km of transmission and distribution lines (Wagner pers. com. 2021). The electricity network will continue to expand, increasing the level of concern for those large birds that are susceptible and known to be threatened by this infrastructure.

An estimated 47 000 Ludwig's Bustards (*Neotis ludwigii*) are killed annually in South Africa by power lines, at a rate of about one bustard per kilometre of line per year (Shaw *et al.* 2018), with the potential for population level effects. Other species of conservation concern killed in large numbers

include flamingos, storks, other bustards, vultures, Secretarybirds (*Sagittarius serpentarius*) and cranes (Jenkins *et al.* 2010, Shaw *et al.* 2018), both in Namibia (Pallett in prep.) and South Africa (Shaw *et al.* 2021). Bustards are particularly prone to collisions, partly due to their skull and eye morphology which makes them blind in the direction of flight (Martin & Shaw 2010). In an evolutionary sense this was never a disadvantage because they are open-country birds with no need to navigate through a three-dimensional landscape that savanna or woodland species inhabit.

Globally reducing collision mortality has proven particularly intractable. When new power lines are to be constructed, careful routing may help to minimise the risks to susceptible birds (APLIC 2012). The most widespread method is marking the lines with static or dynamic bird flight diverters to make them more visible (Bernardino *et al.* 2018). Attempts to reduce the high rate of collision with power lines have shown good success for Blue Cranes (*Grus paradisea*) (92% reduction in fatalities) and other large birds (51% reduction) in South Africa (Shaw *et al.* 2021). This was achieved by affixing such bird diverters to the earth wire – the thin top-most conductor that protects the line from lightning strikes. While such

methods have reduced fatalities by 40-94% in various experimental set-ups in high-strike areas (Janss 2000, Jenkins *et al.* 2010, Barrientos *et al.* 2011, Bernadino *et al.* 2019) the heavy-flying bustards show little decrease in collision rate compared to lines with no diverters, both here in Africa and elsewhere in the world (Jenkins *et al.* 2010, Shaw *et al.* 2015, Shaw *et al.* 2021). In Namibia and South Africa, Ludwig's and Kori Bustards experience a heavy toll from collisions with power lines, while the smaller korhaans (also Otidae) are impacted to a lesser extent. Both Ludwig's and Kori Bustards are threatened red data species in both Namibia (Simmons *et al.* 2015) and in South Africa (Taylor *et al.* 2015) with the main cause of mortality being collisions with power lines. Solutions are clearly needed to protect all bustard populations from further decline.

The idea presented here arose from work trying to mitigate a 460 km length of 400 kV line that Namibia's power utility, NamPower, proposes to construct through prime bustard, vulture and raptor habitat. The daunting task of mitigating this line with bird diverters to avoid fatalities of threatened birds, but with the knowledge that collisions were still certain to occur, prompted the consultants (Sustainable Solutions Trust 2015, Birds and Bats Unlimited 2018) to look for novel alternatives. In this way we could not only test a new mitigation, but also test it against the efficacy of traditional diverters to understand if they are required at all. If bird flight diverters are found to be unnecessary then utility companies may opt to use the methods proposed here. Our aim is to describe a novel method to reduce bustard collision mortalities that is likely to benefit other collision-prone species too, to give theoretical reasons why we believe it will work, and to request researchers and environmental specialists to test our method with unmitigated lines.

## METHODS

Data for this analysis were drawn from two sources: (i) power line surveys on four different capacity power lines conducted in southern Namibia over 15 months in 2012-13 (Pallett in prep.); (ii) mortalities recorded on two power line surveys in the Western and Northern Cape, South Africa in 2014 and 2017. The objective was to assess the distribution of collisions within a span, relative to the total span length of any power line. We therefore selected incidents with the following criteria:

- a) Certainty that the incident was a collision. Any dead large bird found close to a power line was assumed to have collided with it. In some cases, a collision could be confirmed by the presence of broken wing or leg bones, and occasionally the exact site of the collision could be verified by one or two small body feathers stuck to an overhead conductor where the impact had occurred;

- b) Presence of a relatively fresh carcass or a single concentration of body feathers snagged in the vegetation in one place. We assumed that the location of the carcass or main concentration of feathers was close to where it hit the conductor, fell and died, and represented the best estimate of where the collision occurred. Bird remains that were scattered over a wide area without any noticeable concentration in one spot, or that were only a small part of the bird such as a wing or a leg, were not included in the data set, as these could have been carried away from the main carcass by scavengers;
- c) Lateral distance from the centre of the power line less than 30 m. Carcasses further away were rejected on the basis that they could have been moved there by crippling (where an injured bird had fallen to the ground and moved away before dying) or by scavengers carrying the carcass to a new location. The further away from the power line, the more likely this was a factor, and the less confidence we could place in the location of the actual collision;
- d) Incidents that could be attributed to one power line only. Collisions that occurred in places where there were two or more power lines closer than 0.5 km together were rejected, as it was impossible to identify which power line caused the incident.

## Namibian surveys

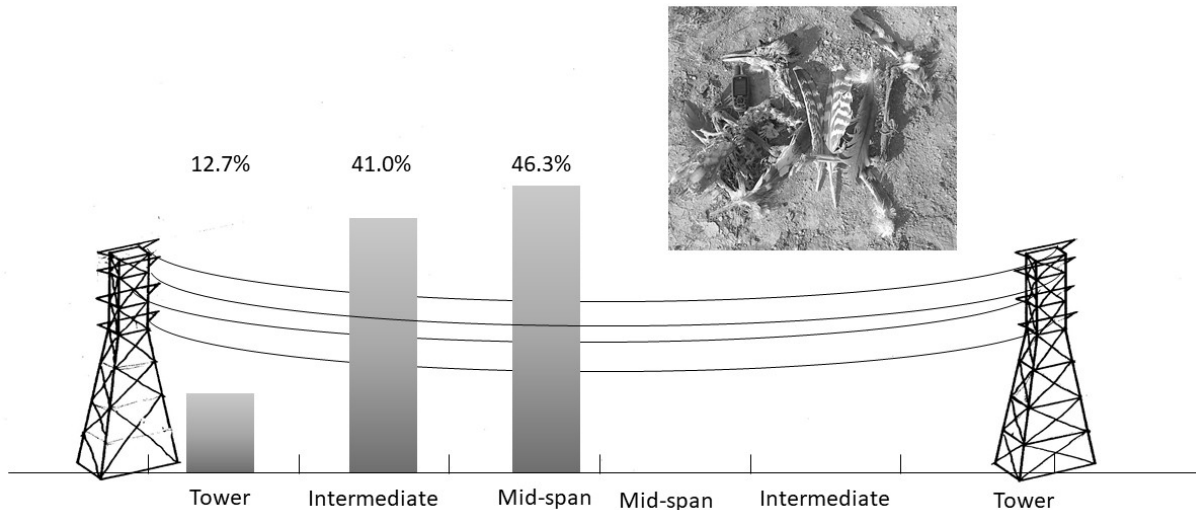
The systematic surveys in southern Namibia were conducted by JP on 81-95 km sections of four voltages of power lines (Pallett in prep.). The lines had capacities of 66, 132, 220 and 400 kV, and surveys were carried out every three months over a 15-month period, with the first survey used as a clearing survey.

## South African surveys

These data derived from a repeat survey of a 50 km section of power line by RES and M Martins along the 400 kV Aries-Helios power line near Kenhardt, and a once-off 7 km power line survey of the Aurora-Juno 400 kV line near Strandfontein on the west coast.

## Monitoring protocol

The monitoring protocol on all the surveys was as follows: the survey routes traversed relatively even ground (not deeply broken or rocky, where carcasses could easily be missed) over open plains with low and/or sparse vegetation, where detectability was relatively constant. While some carcasses of small birds were found, the searching method was directed at birds larger than a Pied Crow (*Corvus albus*) (mass 500 g, total length 50 cm) – which would usually



**Figure 1:** Percentage of large bird collisions in relation to position within the span on power lines. Records combine those for southern Namibia ( $n = 100$ ) and the Northern and Western Cape, South Africa ( $n = 34$ ) and indicate that most large bird deaths (87.3%) occur away from towers

produce enough evidence to be visible within the search zone. The observers drove slowly (10-20 km/h) on the track beneath the power line, with the driver and passenger searching ahead and approximately 30 metres to left and right. All bird carcasses or other evidence of a power line-related incident were recorded, noting the species as far as it could be identified. The coordinates were recorded on a GPS device and photographed at the place where the majority of the body feathers were found. All bird remains were cleared away to prevent recounting on future surveys in Namibia or left *in situ* to judge permanency of remains in South Africa.

Note that while most surveys were repeat surveys, no adjustment for scavenger removal was required as our aim was to record where the carcass was found relative to the towers, not the rate of mortality per kilometre for the species located.

**Data analysis**

Transmission lines and their towers are visible on Google Earth images, so we measured the span where each collision occurred and noted the location of the collision within the span. Each collision in the data set was categorised according to its position within the span, divided into thirds (Figure 1): the central third forming the Mid-span, the two sixths closest to the towers forming another third, labelled Tower, and the two sixths in between labelled Intermediate.

We compared the ratio of selected versus rejected incidents to test whether the selection criteria introduced any bias into the results. A chi-square test with Yates correction (for more than two categories) was used.

**RESULTS**

Of the 327 mortalities that were recorded, 134 (41.0%) were noted as confirmed collisions with accurate locality coordinates (Table 1). The overall proportions of Mid-span: Intermediate: Tower for those carcasses which were selected for this analysis, were not significantly different from those which were rejected [ $\chi^2$  ( $df = 2, n = 327$ ) = 1.376,  $p > 0.1$ ]. Under all the transmission lines surveyed we found a bias towards more large bird collisions in the mid-span of the lines and on either side of the mid-span. In our samples, 87.3% of 134 carcasses occurred under the mid-span and intermediate sections, and only 12.7% occurred around the towers (Figure 1 and Table 1). Even though the length of an average span differs widely when comparing lines of lower versus higher capacity, smaller proportions of collisions occurred at the towers, for all the power line types.

The diversity of birds making up the collision fatalities is shown in Appendix 1. The dominant victims were Ludwig’s Bustard and Kori Bustard, which together comprised 83.6% of all the collisions. The proportion of their collisions occurring in the middle sections compared to the tower rose to 90.2:9.8% when considering only these two bustards.

**DISCUSSION**

The results from this study are very clear: bustards and other large collision victims on Namibian power lines are more likely to hit the central sections of the line but tend to avoid colliding with the towers. This is mirrored by a 3-year study in South Africa’s Karoo where bustards were also much more likely to collide with the mid-span of transmission lines (72%) and

**Table 1:** Distribution of collision carcasses among different sections of power line spans in Namibia and South Africa.

Power lines surveyed	Number of collisions along different sections of the power line span			
	Average span length (m)	Mid-span	Inter-mediate	Tower
66 kV line between Lüderitz and Rosh Pinah, southern Namibia (5 surveys, 95 km each)	198.5	3 (37.5%)	4 (50.0%)	1 (12.5%)
132 kV line west and east of Warmbad, southern Namibia (5 surveys, 81 km each)	321.2	9 (50.0%)	4 (22.2%)	5 (27.8%)
220 kV line south of Keetmanshoop, southern Namibia (5 surveys, 91 km each)	414.5	16 (42.1%)	19 (50.0%)	3 (7.9%)
400 kV line south-east of Keetmanshoop, southern Namibia (5 surveys, 81 km each)	453.4	17 (47.2%)	14 (38.9%)	5 (13.9%)
400 kV line near Kenhardt, Northern Cape, RSA (2 surveys, 56 km each)	360.7	8 (57.1%)	5 (35.7%)	1 (7.1%)
400 kV line near Strandfontein, Western Cape, RSA (1 survey, 7.1 km)	334.0	9 (45.0%)	9 (45.0%)	2 (10.0%)
<b>Total (134 collisions)</b>		<b>62</b>	<b>55</b>	<b>17</b>
<b>Overall percentages</b>		<b>46.3%</b>	<b>41.0%</b>	<b>12.7%</b>

did so at a very high rate of approximately 1.0 bustard/km/year (Shaw 2013).

The collision fatalities in the two countries indicate the same trend: that bustards and other collision-prone species likely fail to see the mid-sections of power lines, but do avoid the towers supporting the lines, most of the time.

It is this ability to see (or hear) the tower and avoid it that is the core of the new mitigation proposed here. By aligning two power lines close together in parallel and staggering the tower of one line to align with the mid-span of the adjacent line, bustards will more likely detect and avoid both power lines.

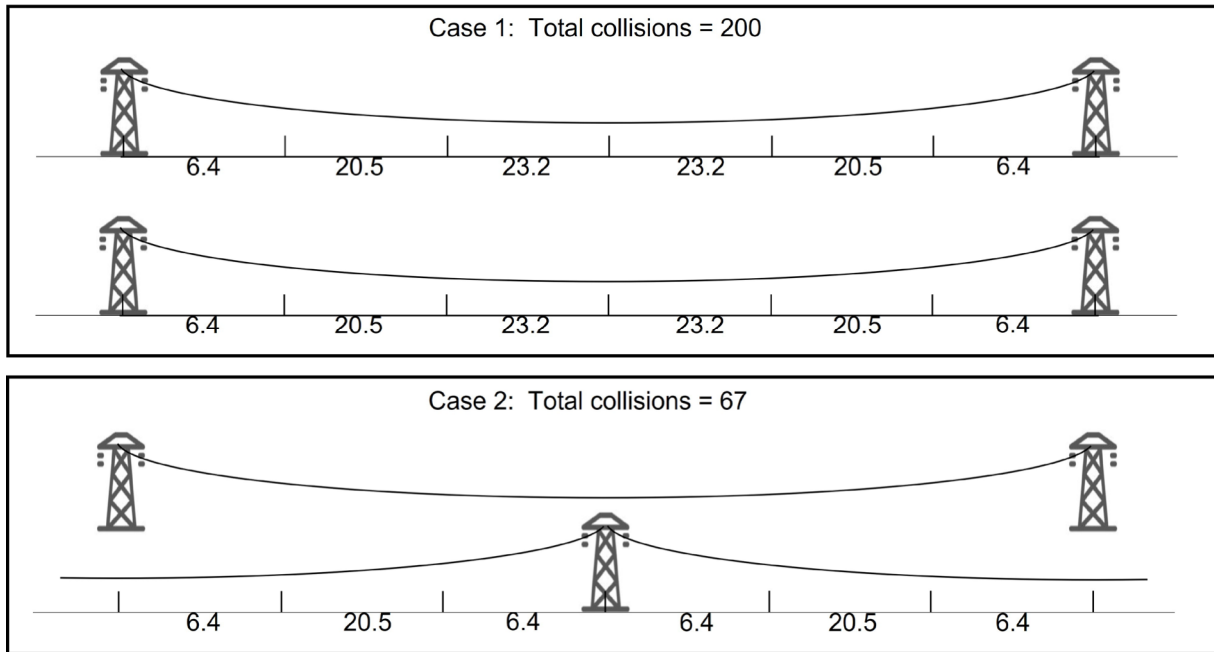
We suggest that bustards are more likely to detect the towers, because (i) they are larger than the conductors and (ii) we noted in our extensive surveys that the wind often whistled through the lattice structure and, for some towers, loose plates or fittings often vibrated with considerable noise. If the birds are detecting the sound rather than the structure itself, this in itself could be exploited to increase the signature of the structure (or the bird diverter) to get around the poor vision of these collision-prone species.

No precise predictions can be made from this idea but the theoretical reduction in collision rate can be calculated by referring to Figure 2. Assuming two separate power lines cause 100 collisions each, the proportion of collisions per section of line will be as shown in Case 1, as deduced from our distribution of collision incidents amongst the span sections. If the

power lines are arranged close together with the towers optimally staggered as illustrated in Case 2, the total collisions will be reduced to 66.6. This is because bundling the two power lines close together theoretically creates the effect of only one power line, and the tower of each line should help to mutually reduce the fatalities in the worst section of the adjacent line. The total collision rate on both lines is 33.3% of the total in Case 1.

Is there any field evidence for this effect? A small sample with “naturally” staggered towers was sampled in two surveys of a section of 220 kV and 400 kV lines running parallel and 58 m apart in South Africa’s Karoo region in 2018 (Figure 3). No avian fatalities were recorded in 14 km of either the 220 kV or the 400 kV line, compared to one bustard fatality in 11 km of a nearby non-staggered 400 kV line in the same habitat. This provides a hint that bundling lines together and staggering the towers could help to reduce bird collision rates. This principle is best suited to lines of similar height. Evidence is needed from other situations, where unequal power lines run in parallel, as it is conceivable that an approaching bird might first see the shorter line, fly over it then collide with the higher line behind it.

If this novel mitigation proves successful it will be especially useful for proposed power lines that cross large areas known to be inhabited by highly collision-prone groups such as bustards, Secretarybird and flamingos. To our knowledge it has not been proposed before and has never been tested.



**Figure 2:** Schematic representation of the theoretical reduction in collision rate from bundling power lines together and staggering the towers. The number of collisions in each section of the span is shown, derived from the proportions recorded under power lines sampled in Namibia and South Africa. Case 1 represents the situation of two separate power lines, causing 200 collisions. Case 2 represents two power lines bundled close together with staggered towers.

Wherever new power lines are to be erected, mitigation measures should include bundling lines together in a narrow corridor, irrespective of design or size, rather than distancing them apart in separate lines. Secondly, where two types of power line are the same (as in the case that prompted this initiative) every effort should be made to position the towers in a maximally staggered arrangement. A similar but reduced benefit of fewer collisions is expected even on lines of different sizes (such as a 220 and a 400 kV line together, as in Figure 3), but logically the amount of staggering will vary due to the different span lengths of the two lines. That is, some parts will have their towers closely aligned, and other parts will have them staggered with the mid-span of one line adjacent to the tower of the other. There will also be

practical elements on the ground which might make it difficult to achieve optimum staggering in hilly terrain, but the principle is to aim for the maximum offset of one tower against the other.

What we presently do not know is (i) whether this theoretical prediction will work in practice and (ii) whether the bustards approaching the mid-span of one line will see the tower of the adjacent line behind the mid-span and take evasive action. If they do take evasive action, then this method has the potential to reduce bustard deaths by 67%. Individual circumstances, such as the angle of approach toward the lines, and the distance between two parallel lines, are expected to contribute to the efficacy of the staggering effect.



**Figure 3:** An example of a 400 and a 220 kV power line in parallel with staggered towers showing the greater visibility of the lines with a tower placed opposite the mid span.



To test these ideas, we propose to set up a monitoring programme on target power lines in Namibia over 460 km before and after construction of a parallel staggered line (with a control line of equal size) to compare collision and fatality rates. We expect *a priori* that fatality rates will be about two-thirds lower compared with the pre-staggered line and the controls.

We also expect that the staggered towers idea will mitigate avian collisions better than simply two lines of equal voltage bundled together with their towers aligned. This is because the conductors are still equally unlikely to be seen by collision-prone birds whether there are two or more (Shaw 2013).

We request researchers and environmental avian specialists to collect systematic data on bustard and other collision-prone bird fatalities along power lines that by chance exhibit the staggered tower effect outlined here. Ideally the fatality rate should be compared with simultaneously collected avian fatalities along un-staggered lines of the same voltage in similar habitat. This will give a first order assessment of the efficacy of this potential new mitigation measure.

Already these methods are being discussed and recommended in South African power-supply circles. It is our hope that staggered towers on adjacent lines will reduce the need for any other form of avian collision-mitigation and thereby be favoured by power utilities to reduce start-up costs involved with affixing spirals or dynamic markers and the maintenance of such mitigations.

## ACKNOWLEDGEMENTS

We thank all those with whom this idea was discussed or field work assistance provided including Dr Jessica Shaw, Peter Bridgeford and Marlei Martins. Max Weylandt and Dr Colleen Seymour assisted with the statistics. We are also grateful to NamPower employees Pierre van Niekerk, Hansie Peens, Bertie Steyn, Johnny Nanyome, Ebro Kooper and David Plaatz, and Karl-Heinz Wagner for the personal communication. Their sharing of knowledge and ideas helped greatly in our own thoughts. JP thanks the NamPower-Namibia Nature Foundation Strategic Partnership, and the Namibian Chamber of Environment for logistical and financial support. RES was supported by various Independent Power producers during survey work for renewable energy facilities. We thank reviewers Jessica Shaw, Holger Kolberg and Peter Ryan for valuable comments.

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**Appendix 1**

Numbers of birds that collided with sampled power lines in Namibia and South Africa, with the relative position within a span where the collisions occurred. Data from the power line surveys described in Methods.

	Mid-span	Intermediate	Tower	Total
Ludwig's Bustard <i>Neotis ludwigii</i>	37	34	9	80
Kori Bustard <i>Ardeotis kori</i>	14	8	2	24
Unidentified large bustard	3	5	0	8
Karoo Korhaan <i>Eupodotis vigorsii</i>	2	0	1	3
Northern Black Korhaan <i>Afrotis afraoides</i>	2	1	1	4
Southern Black Korhaan <i>Afrotis afra</i>	0	1	0	1
Lappet-faced Vulture <i>Torgos tracheliotos</i>	0	1	0	1
White-backed Vulture <i>Gyps africanus</i>	1	0	1	2
Secretarybird <i>Sagittarius serpentarius</i>	0	2	1	3
Martial Eagle <i>Polemaetus bellicosus</i>	1	1	0	2
Greater Kestrel <i>Falco rupicoloides</i>	0	0	1	1
Lesser Flamingo <i>Phoeniconaias minor</i>	1	0	0	1
Unidentified flamingo	0	1	0	1
Pied Crow <i>Corvus albus</i>	0	1	1	2
Unidentified duck	1	0	0	1
<b>Total</b>	62	55	17	134

## Pittman, Reilly

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Tuesday, October 17, 2023 12:43 PM  
**To:** onebellevue@googlegroups.com; Miyake, Brad  
**Cc:** cense-board@googlegroups.com; btcboard@googlegroups.com; Robinson, Lynne; Nieuwenhuis, Jared; lauckjr@hotmail.com; pmcgiffert@aol.com; Stead, Elizabeth; Pittman, Reilly; Horner, Rebecca D  
**Subject:** RE: OneBellevue| Energize Eastside North Segment Land Use Code Accountability and Transparency

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Dear City Manager Miyake,

Mr. Hansen makes good points in his email below. I would like to add one more fact that should be considered.

In May 2019, Washington State passed the **Clean Energy Transformation Act**, which requires PSE to deliver carbon-neutral electricity to its customers by 2030. By 2045, our electricity must be carbon-free. To achieve these goals, PSE is investing in significant amounts of local solar panels and batteries to boost clean energy supplies. Besides reducing climate-changing emissions, these investments will also reduce strain on our transmission system that PSE expected would produce a need for Energize Eastside.

Yesterday (Oct. 16, 2023), PSE held a public webinar to describe its efforts to meet the requirements of the new law. Here is a slide PSE shared to show new targets for energy efficiency, demand response, local solar, and local storage (batteries) that PSE will acquire by 2025:

## Specific targets

Type	2021 CEIP	2023 Biennial Update	Notes
Renewable energy percentage (expressed as avg. over 4 years)	54.5%	54.5%	Adjusted to 4-year average; see previous slide
Energy efficiency	536,717 MWh (2022-23)	<b>397,820 MWh (2024-25)</b>	Updated based on 2024-2025 Biennial Conservation Plan
Demand response by 2025	23.7 MW	<b>86 MW</b>	Increased based on Commission order and cost-effective RFP resources
Distributed energy resources – solar by 2025	80 MW	80 MW	On track
Distributed energy resources – storage by 2025	25 MW	25 MW	On track

the Richards Creek substation, these other infrastructure additions might eliminate the possibility that other transformers serving the Eastside will overload. However, PSE has refused to provide a study that shows how these elements might work together in an emergency. These elements were not anticipated when PSE did its initial needs assessments or when the EIS was developed.

Other significant changes have happened since the FEIS was published. For example, the pandemic caused changes to our local economy as many employees started working from home, creating a lot of excess office space. The passage of the federal Inflation Reduction Act provides incentives that make solar panels and batteries more attractive economically. A deadly heat dome in June 2021 gave us a new appreciation for how trees can mitigate dangerous heat islands in our cities. PSE proposes to cut down many trees in some of the least affluent and most diverse Census Blocks in Central Bellevue, which also experience the highest temperatures in our city according to King County's most recent heat map.

To be sure that all citizens are being treated fairly and PSE isn't requiring us to pay twice for redundant energy infrastructure (namely, a transmission line upgrade as well as all the infrastructure listed in the table above), we really need to see an updated study that includes the benefits of infrastructure that customers have already paid for or will pay for in the years to come.

Indeed, we think Bellevue's land use code pertaining to siting of electrical facilities requires PSE to provide such proof before its application is approved.

Sincerely,

Don Marsh  
Sierra Club Washington State Energy Committee

long after the Final EIS for Energize Eastside was completed, and several months after the land use hearing in Bellevue for the South Segment of the project

---

**From:** 'NORMAN HANSEN' via One Bellevue <onebellevue@googlegroups.com>

**Sent:** Tuesday, October 17, 2023 11:20 AM

**To:** bmiyake@bellevuewa.gov

**Cc:** cense-board@googlegroups.com; btccboard@googlegroups.com; onebellevue@googlegroups.com; lrobinson@bellevuewa.gov; jnieuwenhuis@bellevuewa.gov; lauckjr@hotmail.com; pmcgiffert@aol.com; estead@bellevuewa.gov; rpittman@bellevuewa.gov; RDHorner@Bellevuewa.gov

**Subject:** OneBellevue | Energize Eastside North Segment Land Use Code Accountability and Transparency

To: Brad Miyake, Bellevue City Manager

Thank you for your many years of service for the City of Bellevue. It has been many years since we met concerning Energize Eastside (EE). Now CENSE is reviewing the EE North Segment through North Bellevue including Bridle Trails.

We are asking your office to encourage Planning Staff to review the project per LUC 20.20.255 to provide transparency and accountability in the public interest.

Specifically:

1/Update the Need Analysis for the North Segment especially in view of the impact of the completion of the South Segment with additional transformers. The public interest needs an independent load flow analysis to be transparent and verifiable by qualified expertise.

2/Update the analysis for substantially changed impacts concerning other Technology Alternatives since the original EIS was completed in 2015 to 2017. Now demand response, batteries and solar have become practical and economically competitive.

For your background and information, following is a brief summary of Energize Eastside significant events over the last 10 years:

In late 2013 EE was announced and followed up with a PSE privately selected Community Advisory Group (CAG) to study the alternatives for replacement of their current 115,000 Volt Transmission Line through five Eastside cities. This resulted in only current technology overhead routes being studied. A minority report was issued claiming the process did not evaluate other technical solutions and claimed that the preferred solution had already been predetermined.

Why did PSE decide not to pursue a permit through the State Energy Facility Evaluation Council (EFSEC)? EFSEC process usually results in a permit decision within 12 months. Also, the State has capability to provide an independent load flow analysis to determine need.

EIS was studied over the next few years and finalized in 2017.

PSE professed that EE was needed to serve winter loads. However, they later acknowledged that EE was not needed to serve peak winter loads on the Eastside. They also claimed that EE was needed to transfer 1.5 megawatts to Canada. They also retracted this need as not required. PSE then predicted blackouts in 2017 and 2018 which did not occur and have not occurred since.

PSE was not transparent and did not provide the load analysis data from their 2013 and 2015 studies to the CENSE Consultant until September 26, 2022. Finally, during the 2022 Washington Utilities and Transportation Commission (WUTC) Rate Hearing, PSE provided the load flow input data to the CENSE Consultant. This analysis showed substantial flaws and manipulation of input data and did not support an operational need. This data was made available *after* Land Use Hearings were completed in Renton, Newcastle and South Bellevue.

Over three years ago, PSE finally decided to pursue a North Segment permit with a pre-application meeting with Bellevue and then filed for the permit in February 2021.

This process was mostly dormant until a recent public information meeting in July of 2023.

In summary:

Currently, CENSE and Bridle Trails Community Members are communicating with Bellevue Planning Management and are discussing our request for a "Best Practices" review per the Bellevue Land Use Code for the following updates.

1/ Update the need analysis for the North Segment especially in view of the impact of the completion of the South Segment with additional transformers. The public interest needs an independent load flow analysis to be transparent and verifiable by qualified expertise.

2/ Request to update changed impacts with a Supplemental EIS: Technology has substantially changed since the original EIS was completed in 2015 to 2017. Now demand response, batteries and solar have become practical solutions.

Respectfully,  
Norm Hansen, CENSE President, Coalition of Eastside Neighborhoods for Sensible Energy

--

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To view this discussion on the web visit

<https://groups.google.com/d/msgid/onebellevue/1467953087.19675.1697566785511%40mail.yahoo.com>.

## Pittman, Reilly

---

**From:** NORMAN HANSEN <hansennp@aol.com>  
**Sent:** Tuesday, October 17, 2023 11:20 AM  
**To:** Miyake, Brad  
**Cc:** cense-board@googlegroups.com; btcboard@googlegroups.com; onebellevue@googlegroups.com; Robinson, Lynne; Nieuwenhuis, Jared; lauckjr@hotmail.com; pmcgiffert@aol.com; Stead, Elizabeth; Pittman, Reilly; Horner, Rebecca D  
**Subject:** Energize Eastside North Segment Land Use Code Accountability and Transparency  
**Attachments:** Bellevue Code 20.20.255.pdf

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To: Brad Miyake, Bellevue City Manager

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In summary:

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2/ Request to update changed impacts with a Supplemental EIS:

Technology has substantially changed since the original EIS was completed in 2015 to 2017. Now demand response, batteries and solar have become practical solutions.

Respectfully,

Norm Hansen, CENSE President, Coalition of Eastside Neighborhoods for Sensible Energy

---

**From:** Jim Dennison <[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)>  
**Sent:** Tuesday, August 01, 2023 12:31 PM  
**To:** [rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
**Cc:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Subject:** Sierra Club Comments on Energize Eastside

Good afternoon,

Please find attached the Sierra Club's Comments to the City of Bellevue on Puget Sound Energy's proposed Energize Eastside Project, North Segment, and the Sierra Club's separate comments on the Supplemental Environmental Impact Statement for the project.

Please let me know if you have any questions or concerns. Thank you.

Sincerely,

Jim Dennison

--

**Jim Dennison**  
Associate Attorney  
Sierra Club  
he/him  
435-232-5784 | Mountain Time  
[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)

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# PROPOSED AREAS OF FOCUS FOR THE SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)

July 23, 2023

The Sierra Club acknowledges and supports the City of Bellevue's initiative to revise the 2015 Environmental Impact Statement (EIS) for Puget Sound Energy's (PSE) Energize Eastside transmission upgrade project. We applaud the City's commitment to publish a Supplemental EIS (SEIS) and recommend an in-depth examination of energy, environmental, and equity laws and regulations that have changed since the original EIS.

Outlined below are specific areas we believe should be examined in the SEIS for a fuller understanding of the North Segment project's costs, benefits, and potential impacts.

## 1. IMPACT OF THE CLEAN ENERGY TRANSFORMATION ACT

Considering recent catastrophic heatwaves and the important role of mature trees in mitigating their effects, we recommend studying the potential impacts of PSE's proposal to remove 70% of the mature trees in the Central Bellevue transmission corridor.

In many cities, poorer neighborhoods have fewer mature trees than affluent neighborhoods. Poorer Census Block Groups near the Energize Eastside utility corridor are also some of the hottest parts of the city. For example, residents of Census Block Group 53033.23603.3 earn less than half the median income in Bellevue and, on a hot afternoon, endure temperatures more than 10 degrees higher than neighborhoods with more shade.

In May 2019, four years after the Energize Eastside EIS was completed, Washington's governor signed the Clean Energy Transformation Act (CETA), which requires PSE to consider the benefits and burdens on vulnerable populations in its plans:

*RCW 19.405.010-6 The legislature recognizes and finds that the public interest includes, but is not limited to: The equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health, economic, and environmental benefits and the reduction of costs and risks; and energy security and resiliency. It is the intent of the legislature that in achieving this policy for Washington, **there should not be an increase in environmental health impacts to highly impacted communities.**<sup>1</sup> [emphasis added]*

The original EIS does not quantify the cooling potential of the mature trees in the transmission corridor or the health benefits of cooler temperatures. The EIS also does not appear to recognize the diversity and income level of these impacted neighborhoods. We ask that these omissions be corrected in the SEIS.

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<sup>1</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=19.405.010>

## 2. EVOLVING ENERGY DEMAND

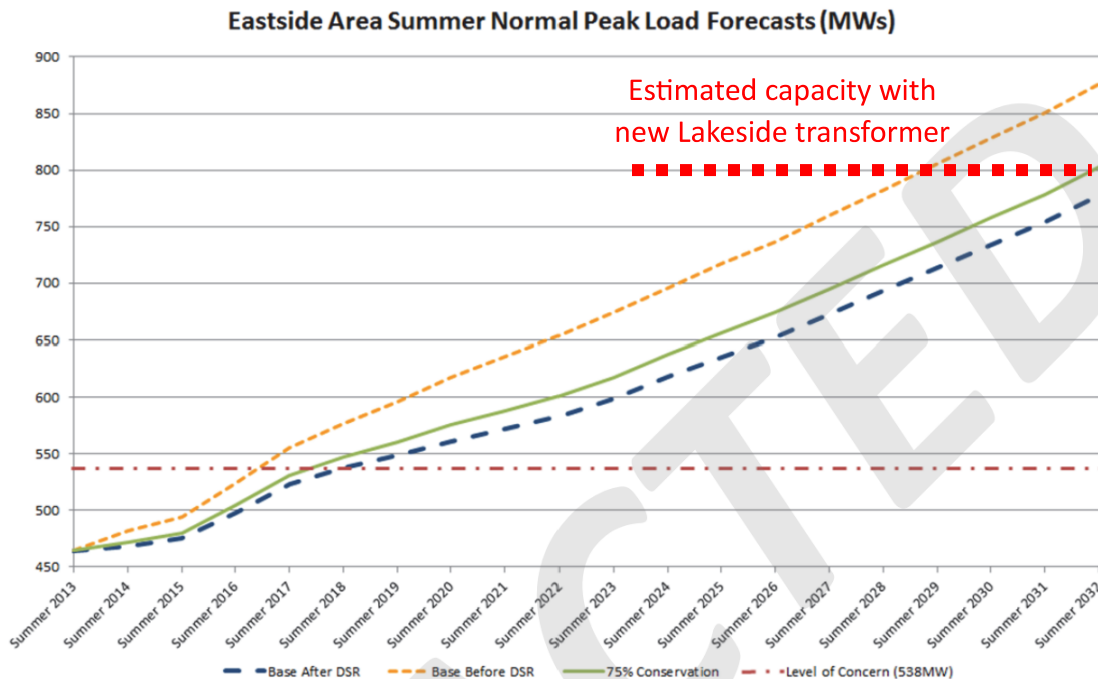
Bellevue has strict decision criteria for siting electrical facilities in the city, as described in Bellevue’s Land Use Code section 20.20.255.E, parts 3 and 4:

- 3) *The applicant shall demonstrate that an operational need exists that requires the location or expansion at the proposed site;*
- 4) *The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole, as certified by the applicant’s licensed engineer;<sup>2</sup>*

In 2015, PSE published the Supplemental Eastside Needs Assessment Report to meet these requirements. However, eight years have passed since the 2015 update, and conditions have dramatically changed. In 2020, an independent analyst found no “clear need” for Energize Eastside to serve a winter scenario:

*Our review of historical winter peak loads and the capacity thresholds in King County shows PSE’s winter peak load actually has been declining over the past several years. While we found that PSE’s own winter load forecast is above the capacity threshold, **we cannot conclude based on the data we analyzed whether there is a clear need for transmission capacity expansion for serving winter peak loads.**<sup>3</sup> [emphasis added]*

Regarding summer need, PSE’s 2015 report includes the following forecast (red line added):



<sup>2</sup> <https://bellevue.municipal.codes/LUC/20.20.255>

<sup>3</sup>

<https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Synapse%20MaxETA%20Energize%20Eastside%20Report-Newcastle%207.22.2020.pdf>, p. 3

The chart shows summer peak loads exceeding the capacity of the Eastside grid during an N-1-1 failure by the summer of 2018. Has Eastside demand grown as vigorously as PSE expected? Did the pandemic and its societal after-effects alter the trend? Is strong adoption of rooftop solar making any difference? These questions are not considered in the original EIS and should be explored in the SEIS.

There is an even more important factor to consider. The Eastside is now served by a fifth 230kV transformer, located in Bellevue. The new transformer, powered by the South Segment of Energize Eastside, increases the emergency capacity of PSE's system to approximately 800 MW, shown on the chart as a thick dotted red line. If this figure is accurate (it should be validated by an updated power flow study), the grid will have sufficient capacity to provide reliable electricity until at least 2032.

To fulfill the requirements of Bellevue's Land Use Code, a clear statement of need is required. A full power flow study must be performed by PSE or an independent analyst to understand the behavior of the grid with the new transformer during an N-1-1 emergency outage.

### 3. CLIMATE CHANGE IMPLICATIONS

In PSE's 2023 Electric Progress Report, PSE improved the accuracy of its system-wide demand forecast by accounting for the impacts of climate change:

*The 2023 Electric Report incorporates climate change in the base energy and peak demand forecast for the first time. We heard from interested parties that it is vital to incorporate climate change because **it affects future demand, and we agree.** ... Before this report, PSE used temperatures from the previous 30 years to model the expected normal temperature for the future. This approach was a common utility practice but did not recognize predicted climate change impacts on temperatures. ... **Including climate change in this report for the first time is a significant milestone, but we recognize this methodology needs to be refined and will evolve in future planning efforts.**<sup>4</sup> [emphasis added]*

Would the Energize Eastside project be different if PSE had properly accounted for warmer winters and focused instead on summer need? The EIS provides no insights and dismisses solar panels and energy storage due to winter concerns:

*Typically, winter peak system loading occurs in the morning and evening, when solar is less effective because of shorter daylight hours. **Solar could help reduce summer peak loads** but because additional capacity would continue to be needed for winter, the use of solar generation to address the transmission capacity deficiency would need to be matched by winter generation capacity and therefore would be redundant.*

***Summer requirements were not evaluated** because the limitations identified during the winter study indicated that energy storage would not be a feasible stand-alone alternative.<sup>5</sup> [emphasis added]*

The SEIS should determine if less expensive and less damaging alternatives could serve summer needs.

---

<sup>4</sup> [https://www.pse.com/-/media/PDFs/IRP/2023/electric/chapters/00\\_EPR23\\_ChapterBook\\_Final.pdf?modified=20230331180618](https://www.pse.com/-/media/PDFs/IRP/2023/electric/chapters/00_EPR23_ChapterBook_Final.pdf?modified=20230331180618), p. 1.4

<sup>5</sup> Phase 1 Draft EIS, p. 2-40

#### 4. IMPACT OF THE INFLATION REDUCTION ACT

Federal legislation has changed the cost calculation for clean energy technologies like solar panels and batteries. The 2022 Inflation Reduction Act (IRA) provides hefty Investment Tax Credits and Production Tax Credits that can defray the costs of solar and battery projects.

In 2018, PSE commissioned a study that dismissed the feasibility of batteries to serve Eastside needs. Besides not accounting for tax subsidies, other shortcomings should be corrected in the SEIS:

- a) The study assumed a battery solution would need to address both summer and winter emergency scenarios. Now a potentially smaller solution could focus on summer need.
- b) The study evaluated solutions comprised only of batteries. A solution that combines batteries, solar panels, and demand response (like Time Varying Rates) is likely to be less expensive than a pure battery solution.
- c) Market costs for solar panels and batteries have declined since the 2018 study. Batteries using different materials (like iron-air batteries, saltwater batteries, and flow batteries) have become more feasible during the past four years.
- d) CETA motivates PSE to invest in clean energy technologies to deliver carbon-free electricity by 2045. Investments in solar panels and batteries can serve a dual purpose, providing cleaner electricity and improving reliability.
- e) Solar panels and batteries can be acquired incrementally each year, with capacity sized to meet just the needs expected in the next few years. In contrast, a transmission line is an “all or nothing” project, with a large amount of capacity added in one expensive chunk. The former solution can adapt to changing trends and conditions; the transmission solution cannot.

The SEIS should fully account for the lower cost and environmental justice advantages of modern energy technologies compared to a poles-and-wires solution.

#### 5. ELECTRIFICATION OF THE EASTSIDE

In 2021, Washington passed the Climate Commitment Act which creates a market-based “cap and invest” system to reduce emissions from fossil fuels 95% by 2050. Some people may wonder if electrification of transportation, space and water heating, and cooking might spike demand for electricity. However, PSE has never claimed electrification is a justification for the project.

In fact, PSE is resisting the legislature’s intent. In PSE’s 2023 Gas Integrated Resource Plan, PSE forecasts only modest reductions in emissions from natural gas, relying on green hydrogen or biodiesel fuel to displace small portions of PSE’s natural gas deliveries. This plan was soundly rejected by all the environmental organizations, including Sierra Club, Climate Solutions, NW Energy Coalition, Citizens Climate Lobby, and Washington Clean Energy Coalition.<sup>6</sup>

Unless PSE embraces electrification to significantly reduce emissions from natural gas, the SEIS should not assume that Eastside demand for electricity will dramatically increase in coming decades.

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<sup>6</sup> All the organizations called upon PSE’s state regulator, the Utilities and Transportation Commission, to reject PSE’s plan. As of the date of this document, no final decision has been announced by the Commission.



## 6. EMERGING TECHNOLOGIES

Many new technologies are becoming feasible that could economically serve Eastside peak demand. Here are just a few developments that should be considered in the SEIS:

- a) *Time Varying Rates.* PSE will soon start a pilot program where customers are charged different rates for electricity consumed at different times of day. For example, many electric vehicles may be set to charge after midnight, when electricity will cost half or even a third of what it will cost during peak hours. Customers will gain more control over their monthly electric bills, and the need for expensive infrastructure to serve peak demand will be reduced.
- b) *Virtual Power Plant.* PSE's new Virtual Power Plant platform will be able to withdraw electricity from participating residential or commercial batteries during peak hours. The battery owners will receive compensation to help defray the cost of the batteries. Assuming owners buy the batteries with their own funds, the cost of infrastructure would be reduced, keeping the cost of electricity reasonable for everyone.
- c) *Vehicle To Home/Grid.* PSE's Virtual Power Plant could also get electricity from idle electric vehicles plugged into bi-directional chargers. The total capacity of the batteries in electric cars, trucks, and buses would dwarf the size of any conventional big battery. Owners would be compensated to help offset the cost of their monthly car payments.

This is not an exhaustive list of the technologies that could play a significant role in our electric grid during the next decade or two. Unless a significant need is documented in the next couple of years, it would be wise to monitor technologies that could help make the Eastside grid more reliable, affordable, equitable, and environmentally friendly.

In conclusion, we believe that these are crucial areas of study to ensure a comprehensive, equitable, and forward-looking Supplemental Environmental Impact Statement.

## Pittman, Reilly

---

**From:** Michiel Wories <mwories@hotmail.com>  
**Sent:** Thursday, October 12, 2023 1:49 PM  
**To:** Pittman, Reilly  
**Subject:** RE: Request for formal review of planned tree removal

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Thanks, Reilly,

That doesn't really address that the trees listed do not meet the requirements, as per PSE submitted paperwork, as I initially indicated. How is it possible that PSE removes trees that doesn't meet the requirements for removal?

Kind regards,

-Michiel

---

**From:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**Sent:** Thursday, October 12, 2023 10:53 AM  
**To:** Michiel Wories <mwories@hotmail.com>  
**Subject:** RE: Request for formal review of planned tree removal

Michiel,

Proposed tree removal is shown on the vegetation management plan. It looks like you have seen the plan as I think the images you sent are pulled from the plan. The plan also includes the replanting templates that list the vegetation that can be installed. PSE will be discussing replanting with each property owner and will be considering any property owner needs or requests.



### Reilly Pittman

Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
Pronouns: He/Him

---

**From:** Michiel Wories <[mwories@hotmail.com](mailto:mwories@hotmail.com)>  
**Sent:** Thursday, October 12, 2023 10:29 AM  
**To:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Subject:** RE: Request for formal review of planned tree removal

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Thanks, Reilly,

How can I find the status of the trees which removal I put in question in the original email (see below).

Kind regards,  
-Michiel

---

**From:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Sent:** Thursday, October 12, 2023 9:24 AM  
**To:** Michiel Worries <[mworries@hotmail.com](mailto:mworries@hotmail.com)>  
**Subject:** RE: Request for formal review of planned tree removal

Hi Michiel,

The tree removal update in the addendum is global, spread across the extent of the project. The update is to correct for the change in wetland rating system that increased wetland buffers. The result is that trees which weren't in the buffer are now in the buffer. Overall, the amount of trees removed is less than was anticipated in the EIS.

The vegetation management plan will show where tree removal is proposed and this and other submitted plans and reports can be found on the [project website](#). Final versions of these documents (if changed) along with the City's decision will also be posted on the website when a decision is issued.



**Reilly Pittman**

Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
Pronouns: He/Him

---

**From:** Michiel Worries <[mworries@hotmail.com](mailto:mworries@hotmail.com)>  
**Sent:** Thursday, October 12, 2023 8:25 AM  
**To:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Subject:** RE: Request for formal review of planned tree removal

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Good morning, Reilly,

I have read the addendum that was sent out this morning, which included some amendments regarding tree removal.

Would I need to request permit documents again? I tried following the links in the document, but it wasn't clear to me where the updated tree removal list is.

Kind regards,

-Michiel

---

**From:** Michiel Worries  
**Sent:** Monday, November 7, 2022 6:42 PM

**To:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>

**Subject:** RE: Request for formal review of planned tree removal

Thanks Reilly,

The row of trees are as below image. These trees are on a popular trail and owned by the Glendale Country Club. The GCC was not informed about the removal.

Link to location: [Google Earth](#)

The trees are all below 15' (image which lists tree inventory and height). The tallest tree is 12.5', and the majority of trees are much shorter. As far as I can tell (from historical satellite images), the trees are there at least since 2000, probably earlier (the owner of the country club should be able to tell). A Leyland Cypress is mature around 16 years of age, so these are not expected to grow further.

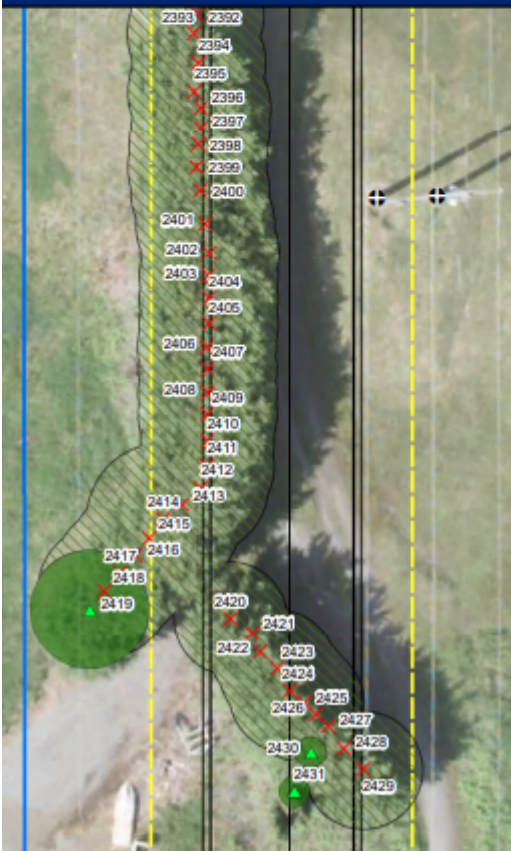




- re Zone
- posed Wires
- isting Pole Locations
- posed Pole Locations
- ▲ Trees to Retain
- △ Trees to be Topped
- ✗ Trees to Remove
- Dead/Dying Tree
- ✕ Previously Removed Trees
- ▨ Canopy to be Removed
- Canopy to Remain

Data sources: Puget Sound Energy (PSE); The Watershed Company (TW)

BELLEVUE OUTREACH MAP: TREE



Under NERC FAC-003-4, PSE must manage vegetation to prevent encroachments into the Minimum Vegetation Clearance Distance of its applicable line(s). Since the Project entails replacing the existing 115 kV lines with lines operating up to 230 kV, the upgraded transmission lines must comply with the NERC standard and PSE's 230 kV vegetation management standard. These standards generally require the removal of trees with an expected mature height of more than 15 feet from the wire zone and managed right-of way (ROW); and removal of trees with an expected mature height of more than 70 feet from the legal ROW. The wire zone is the area underneath transmission conductors extending approximately 10 feet horizontally from the footprint of the conductors. The managed ROW is the area that extends approximately 16 feet horizontally from the outside of the transmission wires in their static position. The legal ROW encompasses the entirety of PSE-owned properties and easements (Figure 2).

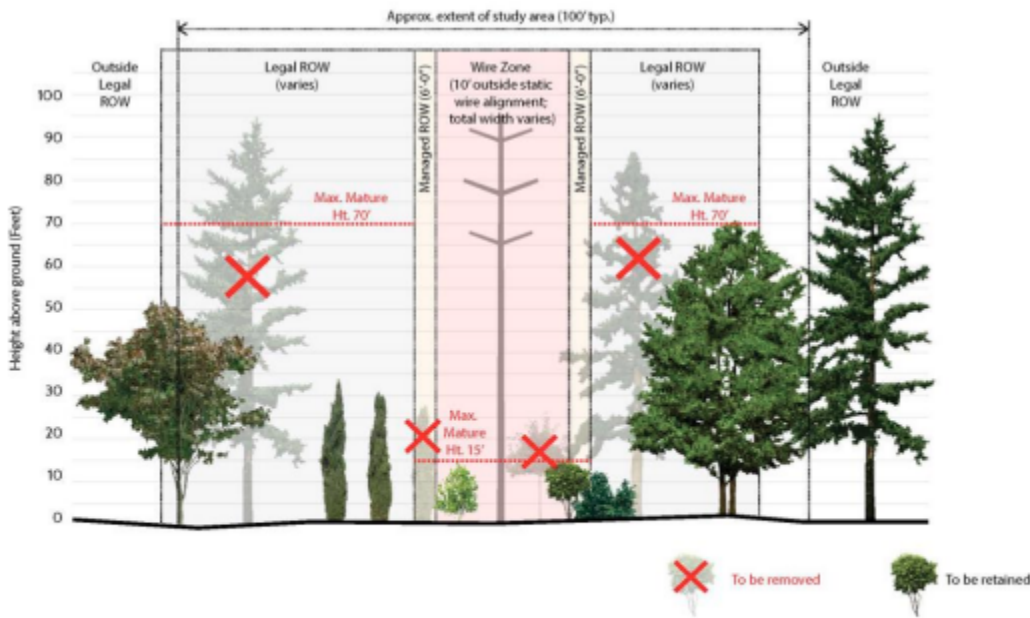


Figure 2. Vegetation impact analysis parameters illustration (cross section view).

936	2392	3425059010	xHesperotropis leylandii	Leyland cypress	10.5	<Null>	<Null>	<Null>	<
937	2393	3425059010	xHesperotropis leylandii	Leyland cypress	8.5	<Null>	<Null>	<Null>	<
938	2394	3425059010	xHesperotropis leylandii	Leyland cypress	6.7	<Null>	<Null>	<Null>	<
939	2395	3425059010	xHesperotropis leylandii	Leyland cypress	7.2	<Null>	<Null>	<Null>	<
940	2396	3425059010	xHesperotropis leylandii	Leyland cypress	6.1	<Null>	<Null>	<Null>	<
941	2397	3425059010	xHesperotropis leylandii	Leyland cypress	8.4	<Null>	<Null>	<Null>	<
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948	2404	3425059010	xHesperotropis leylandii	Leyland cypress	12.3	<Null>	<Null>	<Null>	<
949	2405	3425059010	xHesperotropis leylandii	Leyland cypress	10	<Null>	<Null>	<Null>	<
950	2406	3425059010	xHesperotropis leylandii	Leyland cypress	14	<Null>	<Null>	<Null>	<
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952	2408	3425059010	xHesperotropis leylandii	Leyland cypress	7	<Null>	<Null>	<Null>	<
953	2409	3425059010	xHesperotropis leylandii	Leyland cypress	13	<Null>	<Null>	<Null>	<
954	2410	3425059010	xHesperotropis leylandii	Leyland cypress	6.4	<Null>	<Null>	<Null>	<
955	2411	3425059010	xHesperotropis leylandii	Leyland cypress	10	<Null>	<Null>	<Null>	<
956	2412	3425059010	xHesperotropis leylandii	Leyland cypress	7.7	<Null>	<Null>	<Null>	<
957	2413	3425059010	xHesperotropis leylandii	Leyland cypress	11.1	<Null>	<Null>	<Null>	<
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960	2416	3425059010	xHesperotropis leylandii	Leyland cypress	8.1	<Null>	<Null>	<Null>	<
961	2417	3425059010	xHesperotropis leylandii	Leyland cypress	11.8	<Null>	<Null>	<Null>	<
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972	2428	3425059010	xHesperotropis leylandii	Leyland cypress	9	<Null>	<Null>	<Null>	<
973	2429	3425059010	xHesperotropis leylandii	Leyland cypress	13	<Null>	<Null>	<Null>	<

-Michiel

---

**From:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Sent:** Monday, November 7, 2022 9:11 AM  
**To:** Michiel Worries <[mworries@hotmail.com](mailto:mworries@hotmail.com)>  
**Subject:** RE: Request for formal review of planned tree removal

Hi Michiel,

Thanks for your comments which I have received but I haven't had a chance to respond to you. The review of this project is on-going and your comments are timely. I will add you as a party of record so that you receive future notices on the project.

Based on your comments and the attachment you provided, I think you are referring to a specific property that is next to a trail which is pictured in the pages you attached. If so, can you give me the address or location that you are identifying? It would also be helpful if you could also identify the specific trees you are saying are under height and do not need to be removed.



**Reilly Pittman**

Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
Pronouns: He/Him/His

*\*New!\* Visit our [Virtual Permit Center](#) to schedule a one-on-one virtual appointment with review staff for general permitting questions.*

---

**From:** Michiel Worries <[mworries@hotmail.com](mailto:mworries@hotmail.com)>  
**Sent:** Tuesday, October 25, 2022 12:46 PM  
**To:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Subject:** RE: Request for formal review of planned tree removal

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi, clarifying my question – can you review the proposed removal of the trees to see if it meets the requirements for removal? Based on maturity and current height, as far as I can tell these should not be removed.

Thanks,  
-Michiel

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**From:** Michiel Worries <[mworries@outlook.com](mailto:mworries@outlook.com)>  
**Sent:** Tuesday, October 25, 2022 9:12 AM  
**To:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Subject:** RE: Request for formal review of planned tree removal

Thank you! Bcc'd in response - will further discuss this with Reilly.

I have reattached the section that is of concern. Let me know if I can provide further information.

Thanks,  
-Michiel

---

**From:** LandUseReview <[LUZI@bellevuewa.gov](mailto:LUZI@bellevuewa.gov)>  
**Sent:** Tuesday, October 25, 2022 8:59 AM  
**To:** Michiel Worries <[mworries@outlook.com](mailto:mworries@outlook.com)>; LandUseReview <[LUZI@bellevuewa.gov](mailto:LUZI@bellevuewa.gov)>; PermitTech <[Permit@bellevuewa.gov](mailto:Permit@bellevuewa.gov)>  
**Cc:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>  
**Subject:** RE: Request for formal review of planned tree removal

Hi Michiel,

This permit (21-104989-LO) is being reviewed by Reilly Pittman, who is copied on this email. I recommend discussing this further with him since he is actively reviewing the permit. Thank you.





**Laurie Tyler** (she/her)  
Senior Land Use Planner  
Development Services Department

*\*New!\* Visit our [Virtual Permit Center](#) to schedule a one-on-one virtual appointment with review staff for general permitting questions.*

---

**From:** Michiel Worries <[mworries@outlook.com](mailto:mworries@outlook.com)>  
**Sent:** Tuesday, October 25, 2022 8:54 AM  
**To:** LandUseReview <[LUZI@bellevuewa.gov](mailto:LUZI@bellevuewa.gov)>; PermitTech <[Permit@bellevuewa.gov](mailto:Permit@bellevuewa.gov)>  
**Subject:** Request for formal review of planned tree removal

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi, I have reviewed the permit application from PSE that asks for removal of a row of trees adjacent to a trail. These do not meet requirements for removal. These are mature trees below height requirements for removal, therefore it is unnecessary to remove these. I believe this assessment is made in error, not considering that these are mature trees.

I have attached an excerpt of the permit. Note that PSE is supposed to do outreach. The owner of these trees has not been informed about removal when I asked them about it.

This affects the quality of our neighborhood. These trees shield the country club work facility from view from the neighborhood. An alternative solution (if there are valid concerns about height) is to trim the top the trees, instead of removing these trees, maintaining the character and views of the neighborhood. Topping this type of tree is an effective solution.

I'd like a formal review of this removal. Can you let me know if this email is enough to start a review.

Respectfully,  
-Michiel

Under NERC FAC-003-4, PSE must manage vegetation to prevent encroachments into the Minimum Vegetation Clearance Distance of its applicable line(s). Since the Project entails replacing the existing 115 kV lines with lines operating up to 230 kV, the upgraded transmission lines must comply with the NERC standard and PSE's 230 kV vegetation management standard. These standards generally require the removal of trees with an expected mature height of more than 15 feet from the wire zone and managed right-of way (ROW); and removal of trees with an expected mature height of more than 70 feet from the legal ROW. The wire zone is the area underneath transmission conductors extending approximately 10 feet horizontally from the footprint of the conductors. The managed ROW is the area that extends approximately 16 feet horizontally from the outside of the transmission wires in their static position. The legal ROW encompasses the entirety of PSE-owned properties and easements (Figure 2).

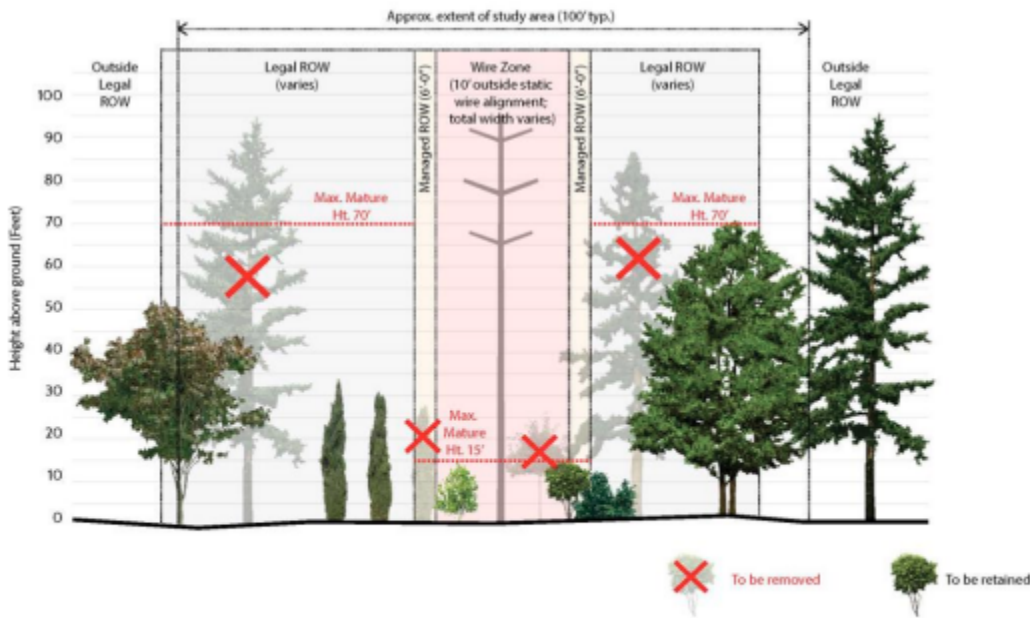


Figure 2. Vegetation impact analysis parameters illustration (cross section view).

## Pittman, Reilly

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**From:** Pittman, Reilly  
**Sent:** Thursday, October 12, 2023 11:37 AM  
**To:** Richard Lauckhart  
**Cc:** Stead, Elizabeth  
**Subject:** RE: Need full responses to my several Public Record Act requests before you proceed with a hearing on the PSE permit request for building Energize Eastside...

Mr. Lauckhart,

Your submitted records requests are processed by the City Clerk or Records staff. For questions on these requests or for additional items, I recommend you follow up directly with the staff who have been assisting you. I'm not sure which group is addressing your requests so if you do not have a direct contact then you can email [publicrecords@bellevuewa.gov](mailto:publicrecords@bellevuewa.gov) for any questions.



### Reilly Pittman

Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)

Pronouns: He/Him

---

**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Tuesday, October 10, 2023 10:18 AM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>; Stead, Elizabeth <estead@bellevuewa.gov>  
**Cc:** Norm Hansen (normpathansen@gmail.com) <normpathansen@gmail.com>; Robinson, Lynne <LRobinson@bellevuewa.gov>; Nieuwenhuis, Jared <JNieuwenhuis@bellevuewa.gov>; Barksdale, Jeremy <JBarksdale@bellevuewa.gov>; Lee, Conrad <CLee@bellevuewa.gov>; Robertson, Jennifer S. <j.robertson@bellevuewa.gov>; Stokes, John <JStokes@bellevuewa.gov>; Zahn, Janice <JZahn@bellevuewa.gov>; Donovan, Jackie <JDonovan@bellevuewa.gov>; serviceATG@atg.wa.gov  
**Subject:** Need full responses to my several Public Record Act requests before you proceed with a hearing on the PSE permit request for building Energize Eastside...

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Mr. Pittman and Ms. Stead-

I have made a number of Public Record Act requests regarding the PSE request for a permit to build Energize Eastside.

As of this date, several of these requests have not been fully responded to including the request I made on July 19, 2023. See my email to you dated August 24, 2023.

I am now learning that you intend to start the Public Hearing on this matter on Nov 9, 2024...even before Bellevue fully responds to my Public Record Act requests.

**Please confirm that I will receive full responses to all my public Record Act Requests prior to the Public Hearing on this matter.**

Please place this communication into the Project File for File Numbers 21-104991 LB and 21-104989 LO

Richard Lauckhart  
Consultant for CENSE and former VP of Power Planning at Puget  
44475 Clubhouse Drive, El Macero, CA 95618  
916-769-6704

## Pittman, Reilly

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**From:** Pittman, Reilly  
**Sent:** Friday, October 6, 2023 1:25 PM  
**To:** Don Marsh; Stead, Elizabeth  
**Cc:** Norm Hansen  
**Subject:** RE: Emergency request

Hi Don,

Thank you for your email, and your other public comments regarding this issue as well. Development Services is still reviewing PSE's proposal for the North Segment of the Energize Eastside project, but as far as I am aware, the study you have requested from PSE is not included in the Project File. As we discussed at our last in-person meeting, we anticipate that the 2023 SEPA Addendum will be issued by the City on October 12th, and Development Services Staff Report analyzing PSE's proposal (and responding to public comments, including your comments) will be issued shortly thereafter. We also discussed scheduling the pre-decision public hearing on PSE's Conditional Use Permit (CUP) application before the City's Hearing Examiner for on November 9, 2023, which is now confirmed. Prior to this November 9th hearing, we will compile and provide the City's Project File to the Hearing Examiner and the public, consistent with the Hearing Examiner Rules of Procedure and DSD's standard practice; and I strongly encourage you to participate in the public hearing on November 9th and provide your comments to the Hearing Examiner in connection with the City's project-level review of PSE's proposal. In turn, Development Services will include written responses to your public comments in the Staff Report, which is the City's practice for all project-level land use decisions.

Also, please remember that the City Council does not have any role in Process I or Process II project-level land use decisions in the City of Bellevue. PSE's Critical Areas Land Use Permit (CALUP) is a Process II land use decision, which is an administrative decision made by the City's Land Use Director. On the other hand, a CUP is a Process I land use decision that the City processes and issues pursuant to LUC 20.35.100 to 20.35.140. Under Process I, the City's Land Use Director issues a recommendation to the Hearing Examiner; and the Hearing Examiner, after holding the November 9th public hearing, will issue a decision on the application. Per LUC 20.20.255.C, a CUP is required for certain new or expanding electrical utility facilities, like PSE's Energize Eastside project. Whether you choose to speak about PSE's project during the City Council's oral communication period is your decision, but I would again encourage you to provide oral or written comments at the November 9, 2023 public hearing before the City's Hearing Examiner if you want for your communications to be included in the administrative record for this project-level decision. Please remember that Development Services and the Hearing Examiner base their respective decisions and recommendations on the City's codes and comments and evidence submitted during the Process I and Process II land use process, through the forums provided as part of those land use processes. If any aspect of the City's land use process is unclear or if you have any additional questions about the anticipated schedule for the City's review of PSE's project, please let me know.

Reilly Pittman  
Environmental Planning Manager  
Development Services Department  
425-452-4350  
rpittman@bellevuewa.gov  
Pronouns: He/Him/His

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

From: Don Marsh <don.m.marsh@hotmail.com>  
Sent: Thursday, October 5, 2023 5:19 AM

To: Pittman, Reilly <RPittman@bellevuewa.gov>; Stead, Elizabeth <estead@bellevuewa.gov>

Cc: Norm Hansen <normpathansen@gmail.com>

Subject: Emergency request

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Mr. Pittman and Ms. Stead,

I intend to speak to the city council on Monday evening regarding PSE's refusal to provide results of a study the company claims to have performed recently. The study purportedly shows the new Richards Creek transformer does not meet the reliability needs of the Eastside electric grid.

Has PSE submitted this study to the City?

If your department has received the study, I will submit a public records request and forgo my presentation to the city council. However, I need to know this answer by Monday afternoon at the latest.

I know you are busy, but if you can confirm or deny your receipt of this report, then I can be assured I'm providing accurate information to the city council.

Sincerely,

Don Marsh

Sierra Club Washington State Energy Committee

## Pittman, Reilly

---

**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Wednesday, October 4, 2023 11:31 AM  
**To:** Council; Miyake, Brad; Stead, Elizabeth; Pittman, Reilly  
**Cc:** Energize Eastside -- mail --; Nedrud, Jens - Transmission; Jim Dennison; Abridged recipients; cense-board@googlegroups.com; philr@sonic.net; Amanda Leon; 300trees-team@googlegroups.com; betsi@betsiforbellevue.com; info@mo4bellevue.com; paul@clarkforbellevue.com; dave@davehamilton.vote  
**Subject:** RE: Questions re 2022 Energize Eastside Needs Assessment Update

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Bellevue City Staff, City Manager, and City Council members/candidates,

Please see the email below from Puget Sound Energy. PSE steadfastly refuses to provide a recent study regarding the need to build the North Segment of Energize Eastside through North and Central Bellevue. PSE claims that the recently energized transformer at the Richards Creek substation will not mitigate the threat of large-scale blackouts in an emergency scenario. The company also claims that a further extension of the transmission line northward *will* solve the problem, even though that extension **will not increase transformer capacity** in any emergency scenario anticipated by federal reliability standards.

Because PSE is not providing this information, the public cannot fully participate in a public land use hearing on this matter. We need this information well in advance of the hearing so that we may show that the project is either not necessary, or that alternative technologies that are much less damaging to the environment and vulnerable populations are cost effective in eliminating any remaining minor overloads in the Eastside grid. These questions directly address sections of Bellevue's Land Use Code pertaining to the siting of electrical facilities in our city.

**THEREFORE, we respectfully request that the City of Bellevue delay any recommendation or any hearing on this project until six weeks after PSE has provided the public with the requested updated information accessible through its website.** (The most recent study of need available on the Energize Eastside website is from 2015.)

Sincerely,

Don Marsh  
Sierra Club Washington State Energy Committee

---

**From:** Energize Eastside -- mail -- <energizeeastside@pse.com>  
**Sent:** Wednesday, October 04, 2023 9:48 AM  
**To:** Don Marsh <don.m.marsh@hotmail.com>  
**Cc:** estead@bellevuewa.gov; rpittman@bellevuewa.gov; Jim Dennison <jim.dennison@sierraclub.org>  
**Subject:** RE: Questions re 2022 Energize Eastside Needs Assessment Update

Mr. Marsh,

As consistently stated, the entire 16 miles of transmission lines and Richard's Creek substation are needed to meet the need described and analyzed in the City of Bellevue's EIS. Operation of only the south transmission lines and the new substation does not solve the problem. Until the entire project has been completed, the system is at risk of overloads as

has been the case over the past five of six years. For additional information, please see the documents at:  
<https://www.utc.wa.gov/casedocket/2022/220066/docsets>

The PSE Energize Eastside team's efforts are entirely focused on preparing for the CUP hearing and will not be responding to such inquiries until the hearing.

Kind regards,  
The Energize Eastside Team

---

**From:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Sent:** Thursday, September 28, 2023 5:09 PM  
**To:** Energize Eastside -- mail -- <[energizeeastside@pse.com](mailto:energizeeastside@pse.com)>  
**Cc:** [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov); [rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov); Jim Dennison <[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)>  
**Subject:** RE: Questions re 2022 Energize Eastside Needs Assessment Update

**CAUTION - EXTERNAL EMAIL**

Phishing? Click the PhishAlarm "**Report Phish**" button.

I participated in the Annual Bellevue Reliability Workshop today. During the workshop, PSE representatives Justin McConachie and Ryan Yelle stated that PSE had completed a study including the Richards Creek transformer that shows the North Segment of the project is still needed to prevent overloads. Can we see this study?

Thanks,  
Don Marsh

---

**From:** Energize Eastside -- mail -- <[energizeeastside@pse.com](mailto:energizeeastside@pse.com)>  
**Sent:** Tuesday, September 26, 2023 1:51 PM  
**To:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Cc:** [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov); [rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov); Jim Dennison <[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)>  
**Subject:** RE: Questions re 2022 Energize Eastside Needs Assessment Update

Mr. Marsh,

Thank you for your emails regarding the Energize Eastside project. We have noted your comments and circulated them with the broader project team.

Kind regards,  
The Energize Eastside Team

[Energize Eastside](#)  
[PUGET SOUND ENERGY](#)  
1-800-548-2614



---

**From:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Sent:** Thursday, September 21, 2023 8:01 PM



**To:** Energize Eastside -- mail -- <[energizeeastside@pse.com](mailto:energizeeastside@pse.com)>  
**Cc:** [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov); [rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov); Jim Dennison <[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)>  
**Subject:** RE: Questions re 2022 Energize Eastside Needs Assessment Update

**CAUTION - EXTERNAL EMAIL**

Phishing? Click the PhishAlarm "Report Phish" button.

Dear Energize Eastside Project Team,

This is a reminder that I'm hoping to hear your response to the email below by tomorrow (Friday). We would like to avoid sending letters to the Bellevue City Council and the UTC if the omissions we have identified are a simple misunderstanding or a shortcoming PSE promises to rectify in the near future. In any case, a definitive yes or no from PSE will be helpful in communicating with policymakers and letting the public know what will happen before the land use hearing in Bellevue.

Respectfully,

Don Marsh

---

**From:** Don Marsh  
**Sent:** Tuesday, September 19, 2023 4:51 AM  
**To:** 'energizeeastside@pse.com' <[energizeeastside@pse.com](mailto:energizeeastside@pse.com)>  
**Cc:** [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov); [rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov); Jim Dennison <[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)>  
**Subject:** Questions re 2022 Energize Eastside Needs Assessment Update  
**Importance:** High

Dear Energize Eastside Project Team,

I hope this letter finds you well. I am writing in my capacity as a member of the Sierra Club Washington State Energy Committee to discuss some concerns and questions we have related to PSE's 2022 Energize Eastside Needs Assessment Update (attached). Specifically, our inquiries pertain to PSE's application for a land use permit for the construction of the North Segment of the transmission line that passes through Central and North Bellevue.

To begin with, it is surprising that the 2022 Needs Assessment Update is not publicly available on the Energize Eastside's online archive. We obtained a copy through a public records request fulfilled by the City of Bellevue two weeks ago. Considering the public hearing expected later this year, it is imperative for stakeholders to have access to the most up-to-date and comprehensive data. We note that some conclusions in the 2022 update seem to contradict those of a 2020 study conducted for the City of Newcastle, which is included in the online archive. Transparency is essential for a significant project that impacts numerous stakeholders, and so we strongly recommend that the latest assessment be made publicly accessible.

Furthermore, our review of the 2022 document revealed what appear to be noteworthy omissions. Figure 0-1 on Page 4 does not include the "South Segment" 230 kV bulk transmission line of the Energize Eastside project. Although this line was still under construction in 2022, it is nearing completion this year and will unquestionably be operational within the 20-year study period.

Similarly, the topology changes listed in Table 2.3-1 on Page 8 do not include either the new transmission line or the new 230 kV transformer at Richards Creek. During last year's General Rate Case before the Washington Utilities and Transportation Commission, PSE emphasized that these infrastructure investments were "used and useful" in order to include \$100 million in the rate base and charge customers to recover the company's expenditures. The 2022 Needs Assessment suggests the project will not provide any improvement in long-term reliability, and customers should be refunded any extra charges they have incurred.

The selective omissions extend to the P6 Results detailed on Page 17, where loading levels for the Richards Creek transformer are conspicuously absent. Inclusion of this transformer in PSE's load flow modeling could potentially affect the loading levels of the other four 230 kV transformers in various scenarios. These are not trivial matters; they are vital for assessing the utility and necessity of the proposed North Segment. Bellevue's land use process requires that new electrical facilities demonstrate a clear benefit to the local community.

We hope these omissions are an honest mistake and that PSE will issue timely corrections before the City of Bellevue issues its recommendations regarding the company's land use permit application. To clarify the need for the North Segment, we formally request that PSE issue a 2023 Needs Assessment Update that includes both the South Segment and the Richards Creek transformer in the model. We also insist that this update be publicly available on the Energize Eastside website to ensure that all stakeholders can fully understand the need for the project and the magnitude of any shortfalls that could be addressed with alternative technologies to minimize cost and disruption to the community, in accordance with Bellevue's land use code and recent legislation.

Thank you for your attention to these matters. Due to Bellevue's aggressive timeline for publishing its recommendations regarding the North Segment project, we ask for your response no later than **Friday, September 22**.

Sincerely,

Don Marsh  
Sierra Club Washington State Energy Committee

## Pittman, Reilly

---

**From:** whalvrsn1@frontier.com  
**Sent:** Tuesday, September 26, 2023 1:27 PM  
**To:** Stead, Elizabeth; Pittman, Reilly  
**Cc:** Bridle Trails Community Club; Norm Hansen; P. Johnston; Loretta Lopez; <lauckjr@hotmail.com>; CENSE Board; Karen Esayian; Jeanne DeMund; Don Marsh; Kelly Bach; SUZANNE HALVERSON  
**Subject:** Energize Eastside - Bellevue North EIS Testimony  
**Attachments:** PSE - Bellevue North Permit.docx

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Good Morning,

Attached please find Warren and Maryanne Halverson's testimony related to Bellevue North Public Hearing and Testimony July 18th to date.

We strongly support your complete development of a supplemental EIS for the North, as required by Bellevue's Land Use Codes and noted herein including the EIS chapters concerning Need; Alternatives; Public Safety and Environment. I know we can all agree that a lot has changed in the past ten years -- several key examples are provided.

My wife and I also want to share with you how strongly we believe in Bellevue; our faith in the staff; and the importance of open two way communication.

Once again, Thank you!.

Warren & Maryanne Halverson  
13701 NE 32nd Place  
Bellevue, Washington 98005  
425-883-0568; 206-605-0568

**“Energize Eastside Bellevue North Segment” Warren Halverson Public Testimony – July 18, 2023 Bellevue City Hall submitted in writing September 25th**

**Good Evening. My name is Warren Halverson; 13701 NE 32<sup>nd</sup> Pl in Bridle Trails. My wife and I have lived here; worked here; raised our family and been involved in the community for over 40 years. We chose Bridle Trails because it is uniquely rural with an abundance of large lots; trees and trails. I am testifying on behalf of my wife, myself and many neighbors.**

**In referencing Bellevue North, we embrace Bellevue’s Land Use Codes, noted below\*.**

**After ten years one would think that the City and Puget Sound Energy would have resolved major issues with current factual information. Unfortunately that is not the case. So thank you for this opportunity.**

### **The EIS**

**What has changed over these many years? The EIS contains hundreds of pages; 11 chapters and 13 appendices. Yet, two cornerstone Chapters – Chapter 1: NEED & Chapter 2: ALTERNATIVES are outdated and do not reflect current and critical data and information. For years and within this EIS EE has been based upon aged studies, but only one actual load flow study and forecast. This was “The Eastside Customer Demand Forecast” for the years 2014-2024 conducted by Gentile in 2015 (It is important to note these dates and the analysis because load flow studies are the basis commonly used in the industry to measure demand.) This study concluded that “PSE’s projected growth would be 2.4% growth. There would be peak load deficiencies and rolling blackouts in 2017/2018.” None of this happened. The City does not know the demand for the Eastside or Bellevue North. Another notable factor impacting demand and facilities in Bellevue is completion of Bellevue South. Bellevue South, which includes the business district, provides electrical flow over 250KV lines and a new transformer. What impact does this have on the NEED for Bellevue North? If you do not know the need, you cannot really decide between alternative solutions. This EIS did not adequately review technological alternatives or combinations thereof. These alternatives are vastly improved, less costly and available over the last ten plus years.**

**Other major EIS impacts requiring review are: “The Clean Energy Act”; “The Washington Canadian Columbia River Treaty” two Bellevue Comp plans; Bridle Trails sub area plan and unique tree ordinances; Safety issues – including a “Crime Crisis” ; Homeless; Light rail issues – to name a few. So, what has changed over ten+ years that impacts Bellevue and Bellevue North in this proceeding? EVERYTHING!!!!**

## P.2 Energize Eastside North Segment Testimony – Warren & Maryanne Halverson

1. Our first and the most obvious recommendation is to review the current EIS; to do analysis, studies and to provide written updates -- where appropriate -- for public comment in a Supplemental EIS. A current load flow study is a mandatory requirement to justify Bellevue North. The City staff does not have to rewrite a whole new EIS but Bellevue's LUCs necessitate current information – a supplement.

\*Reference Bellvue LUC's : LUC 20.20.255 (D)1- Alternative Sites: 2© - Customer Need; (D)3 – Technology Considered; (E) 3 – Operational Need; 4 – Reliability.

In addition, a supplemental EIS is even more important to insure transparency, open two way communication and an understanding by the public concerning Energize Eastside and its impacts upon Bellevue North. In our Canter Greens neighborhood roughly 60% of the residents have moved here within the last five years and have little knowledge of this issue. For them and even me the public announcement mailer was totally confusing. As a result only 10+/- were in attendance. No formal record was kept of the testimony. I think it safe to say neither the presentations or questions and answers satisfied either the staff or the attendees on July 18th

2. When the supplemental EIS is finalized, a draft be publicized and provided to the public for final comment Because it has been several years since the first public meeting with the EBCC, that final report should also be provided.

### Public Safety

The EIS STATES that the construction period will be “15 days on a lot and up to two months” on the line. Somerset residents tell us that construction took “a few days on each lot but the setup roadwork and total encumbrance on their property was 8 months. Impacted Bellevue North property owners need to know this because this creates significant safety issues. Can the City of Bellevue and PSE ensure our safety as contractors build access roads; use heavy equipment in placing 95' poles and stringing heavy lines – through backyards to our backdoos -- all adjacent to two 40 year old hazardous liquid pipelines?

Recently, a burglar walked down the trails along these pole lines on a Sunday; climbed up a ladder into a bedroom of a house and and terrified a single mother who was downstairs on a Sunday. We are VERY CONCERNED about the public safety risks of further opening corridor access to our neighborhoods and, literally, to the back doors of our homes for months.

This risk – which is amplified by the recent introduction of light rail; increased homeless and insufficient protections -- should not and cannot be borne by homeowners.

- 3. With our rural environment and extensive trail systems, what safeguards will the City of Bellevue and Puget Sound Energy provide? This issue is VERY IMPORTANT and should be dialogued and reviewed amongst stakeholders – including PSE, city staff, police and local residents and finally provided as part of the supplemental EIS.**

**\*Ref LUC 20.20.255 F (3&4) – Safety/Design Standards; Note City Council Meetings**

**Environment - Trees**

Bellevue is known as a “City in the Park”. Bridle Trails is known for its significant forested area. Many years ago, the Bridle Trails community along with the city developed and implemented a historic tree ordinance protecting this forest. Today it is a prototype for the city, in fact, many other cities. PSE is proposing cutting down 600+ trees nearly 200 of which are significant (Final EIS March 2018 page 4.4-10). If we are serious about the climate; about achieving a 40% tree canopy we must get serious about the value of trees, including significantly limiting the cutting of significant trees (monitoring this) and paying fair market value for each tree i.e include market value, stormwater/erosion expenses, temperature, change – ECO SYSTEM impacts. This needs to be studied and determined. Furthermore, “2 bushes for a tree doesn’t cut it anymore”. If this task hasn’t been done and updated, NOW is the time to take serious steps to achieve OUR 40% tree canopy objective . In the budget process, I believe two additional headcounts were added to the environmental group, So, the timing couldn’t be better to do this in the EIS supplemental review process.

- 4. Maybe, we do not have to cut down all the trees envisioned 10+ years ago? Maybe, it is time to find out? Please calculate and provide the difference in your review!**

**\*Ref Bellevue LUC ‘s: 20.20.255E5(b) – Residential Character/Safety; LUC 20.30B140 Neighborhood Character; LUC 20.30P140**

We want to thank you for this opportunity to provide these comments

- 5. I WOULD SIMPLY ASK THAT YOU LISTEN CAREFULLY; HOLD JUDGMENT AND DOGGEDLY PURSUE CURRENT INFORMATION.... THANK YOU**

Warren & Maryanne Halverson  
13701 NE 32nd Place  
Bellevue Washington 98005

## Pittman, Reilly

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Wednesday, September 20, 2023 4:11 PM  
**To:** Pittman, Reilly; Stead, Elizabeth  
**Cc:** hansennp@aol.com  
**Subject:** Comment for Energize Eastside North Segment permit application

**Categories:** SEPA

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

**Please include this comment in the public record for PSE's Energize Eastside permit application.**

We recently discovered that the South Segment transmission line and new transformer at Richards Creek are now fully energized. This is timely and important information since it has happened BEFORE the City publishes its recommendation regarding the land use permit for the North Segment of the line.

To our knowledge, PSE has not conducted a study that shows to what extent the new transformer will relieve overloading of the four original 230 kV transformers that serve Bellevue and the Eastside. An updated study is likely to show that the overloads are eliminated or reduced to a moderate level such that relatively minor investments in solar panels and batteries (which are needed anyway to meet the requirements of the Clean Energy Transformation Act) might suffice. The reduced cost and impact of such alternatives would be better for ratepayers, residents, and the environment (preserving hundreds of valuable urban trees).

We have asked the City of Bellevue to publish a Supplemental EIS to clarify the level of need and how inexpensive alternatives might be sufficient to eliminate any remaining overloads. Both of these questions must be answered to be compliant with Bellevue's land use code regarding the siting and operation of electrical facilities. If there are other ways to answer these questions, then a Supplemental EIS might not be necessary. Please let us know if PSE or ESA will be conducting the necessary power flow modeling to provide definitive technical answers. If a public hearing is conducted without clear answers to these relevant questions, the public interest would not be properly served.

Respectfully,

Don Marsh  
Sierra Club Washington State Energy Committee

## Pittman, Reilly

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Tuesday, September 19, 2023 4:51 AM  
**To:** energizeeastside@pse.com  
**Cc:** Stead, Elizabeth; Pittman, Reilly; Jim Dennison  
**Subject:** Questions re 2022 Energize Eastside Needs Assessment Update  
**Attachments:** Needs Assessment update\_11-28-2022 2.53.04 PM.pdf

**Importance:** High

**Categories:** Need

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Energize Eastside Project Team,

I hope this letter finds you well. I am writing in my capacity as a member of the Sierra Club Washington State Energy Committee to discuss some concerns and questions we have related to PSE's 2022 Energize Eastside Needs Assessment Update (attached). Specifically, our inquiries pertain to PSE's application for a land use permit for the construction of the North Segment of the transmission line that passes through Central and North Bellevue.

To begin with, it is surprising that the 2022 Needs Assessment Update is not publicly available on the Energize Eastside's online archive. We obtained a copy through a public records request fulfilled by the City of Bellevue two weeks ago. Considering the public hearing expected later this year, it is imperative for stakeholders to have access to the most up-to-date and comprehensive data. We note that some conclusions in the 2022 update seem to contradict those of a 2020 study conducted for the City of Newcastle, which is included in the online archive. Transparency is essential for a significant project that impacts numerous stakeholders, and so we strongly recommend that the latest assessment be made publicly accessible.

Furthermore, our review of the 2022 document revealed what appear to be noteworthy omissions. Figure 0-1 on Page 4 does not include the "South Segment" 230 kV bulk transmission line of the Energize Eastside project. Although this line was still under construction in 2022, it is nearing completion this year and will unquestionably be operational within the 20-year study period.

Similarly, the topology changes listed in Table 2.3-1 on Page 8 do not include either the new transmission line or the new 230 kV transformer at Richards Creek. During last year's General Rate Case before the Washington Utilities and Transportation Commission, PSE emphasized that these infrastructure investments were "used and useful" in order to include \$100 million in the rate base and charge customers to recover the company's expenditures. The 2022 Needs Assessment suggests the project will not provide any improvement in long-term reliability, and customers should be refunded any extra charges they have incurred.

The selective omissions extend to the P6 Results detailed on Page 17, where loading levels for the Richards Creek transformer are conspicuously absent. Inclusion of this transformer in PSE's load flow modeling could potentially affect the loading levels of the other four 230 kV transformers in various scenarios. These are not trivial matters; they are vital for assessing the utility and necessity of the proposed North Segment. Bellevue's land use process requires that new electrical facilities demonstrate a clear benefit to the local community.

We hope these omissions are an honest mistake and that PSE will issue timely corrections before the City of Bellevue issues its recommendations regarding the company's land use permit application. To clarify the need for the North



Segment, we formally request that PSE issue a 2023 Needs Assessment Update that includes both the South Segment and the Richards Creek transformer in the model. We also insist that this update be publicly available on the Energize Eastside website to ensure that all stakeholders can fully understand the need for the project and the magnitude of any shortfalls that could be addressed with alternative technologies to minimize cost and disruption to the community, in accordance with Bellevue's land use code and recent legislation.

Thank you for your attention to these matters. Due to Bellevue's aggressive timeline for publishing its recommendations regarding the North Segment project, we ask for your response no later than **Friday, September 22**.

Sincerely,

Don Marsh  
Sierra Club Washington State Energy Committee

# 2022 Energize Eastside Needs Assessment Update

Prepared by



Report Prepared by

Sylvia Gard, Puget Sound Energy  
Eleanor Ewry, P.E., Puget Sound Energy  
Thomas Gentile, P.E., Boston Power Systems

August 2022

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## Executive Summary

Puget Sound Energy's (PSE) Energize Eastside project will build a new substation, upgrade approximately 16 miles of existing transmission lines from Redmond to Renton (the Eastside) and rely on continued aggressive electric conservation efforts. PSE's last major upgrade to the backbone of the Eastside's electric grid was in the 1960s. Since then, the Eastside's population has grown eight-fold and our economy relies on power in ways it did not over 50 years ago. Federal regulations require PSE to have sufficient infrastructure to meet foreseeable demand requirements or use Corrective Action Plans (CAPs) which include intentional load shedding (commonly referred to as rolling blackouts) as an option. Studies show that if no action is taken to upgrade the backbone of the Eastside's transmission system, PSE may have to utilize corrective action plans that include intentional load shedding to meet federal requirements. This could affect more than 130,000 customers, at a cost of tens of millions of dollars to the local economy.

This project was first identified in 1993, and it has appeared in PSE's Horizon Plan and the Bellevue Comprehensive Plan since that time. In 2009, PSE's annual NERC required planning study indicated that there was a need in the Eastside area. The 2013 PSE/Quanta Needs Assessment study confirmed that there was a need in the Eastside area by the winter of 2017-2018 and summer of 2018. That study showed multiple key transmission equipment overloads in the Eastside area which directly affect PSE's ability to reliably serve local capacity growth. The subsequent 2015 Supplemental Needs Assessment, which was performed to reaffirm potential system deficiencies, concluded that there is a transmission capacity deficiency in the Eastside area which at that time was projected to develop by the winter of 2017-18 and the summer of 2018. The identified deficiency was determined to require the expanded use of CAPs to manage overloads for certain contingencies.<sup>1</sup> The 2015 assessment also concluded that the transmission capacity deficiency would get worse as load grows.

To date, PSE has received Conditional Use Permits (CUP) in Renton, Newcastle, Bellevue (south segment of the project), and Redmond. To support our CUP application for the north Bellevue segment as required by Bellevue's Land Use Code Sec. 20.20.255, PSE is providing this updated Energize Eastside needs assessment with the latest information on our system and electricity demand trends. Specifically, this document summarizes the results of the latest Energize Eastside Needs Assessment, conducted in 2022 (the 2022 Needs Assessment) for the system serving the Eastside area within King County, and discusses the major differences between the 2022 Needs Assessment and the Supplemental Needs Assessment Report dated October 2015. Utilizing data from 2021, the 2022 Needs Assessment uses the latest updates to information on observed summer and winter peak demand, the PSE load forecast, and system topology.

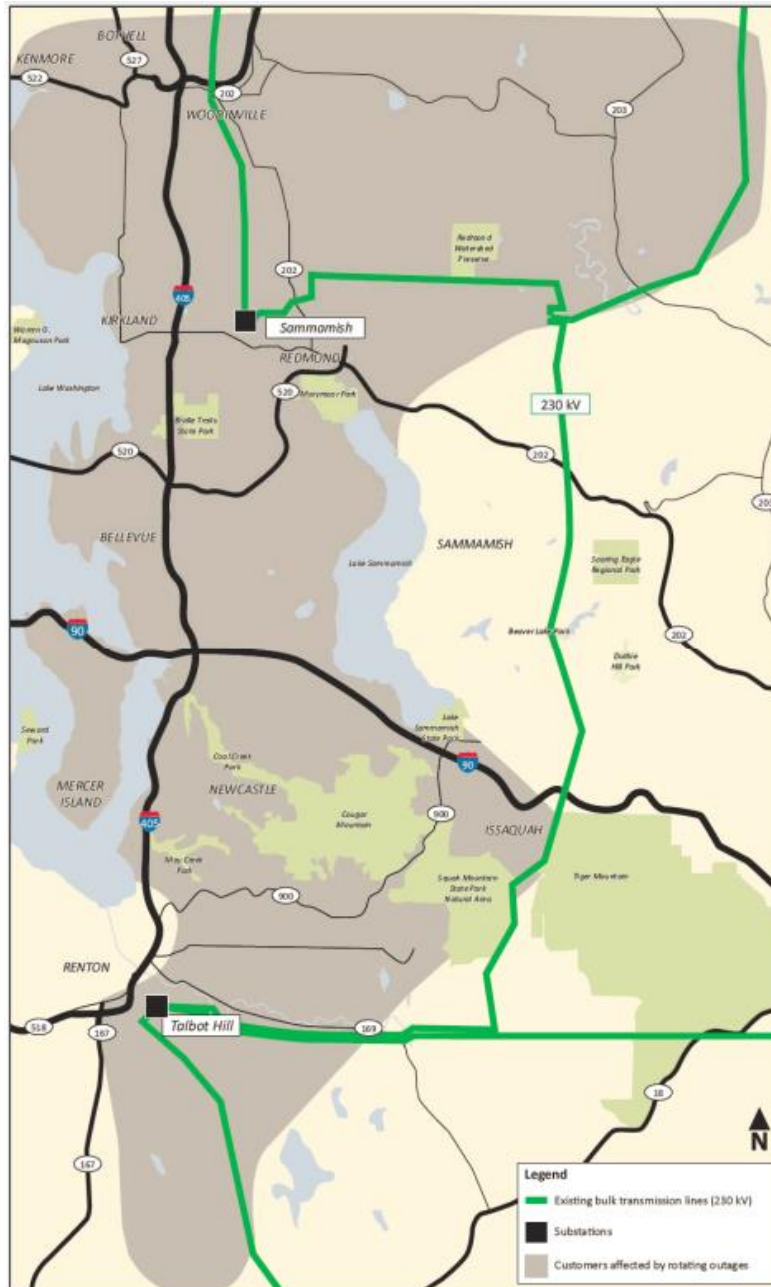
The 2022 Needs Assessment study, utilizing the latest load forecast and system information, verified that a transmission capacity deficiency is present today under certain contingency conditions for the summer season and required the use of CAPs to manage overloads for certain contingencies. Additionally, the 2022 Needs Assessment verified that there is still a transmission capacity deficiency in the Eastside area in the winter for both base and sensitivity cases in the ten-year planning horizon. The

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<sup>1</sup> NERC Glossary of Terms: Contingency - The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element.

deficiency will develop by the winter of 2030-31 and currently exists in the summer. In short, a winter and summer need for the Energize Eastside project remain in our ten-year planning horizon. In addition, the 2022 Needs Assessment continued to show that this transmission capacity deficiency is expected to increase as load grows. Cities in the deficiency area include Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Mercer Island, Issaquah, Newcastle and Renton along with towns of Yarrow Point, Hunts Point, and Beaux Arts, as well as other cities within north King County affected by potential CAPs. Figure 0-1 shows the rough area of cities in the deficiency area and impacted by the CAPs.

Figure 0-1 Map of Cities in Eastside Area<sup>2</sup>



<sup>2</sup> Map is from Figure 2-1 of the Puget Sound Energy Energize Eastside Outage Cost Study Report by Nexant

# 1. Introduction

The purpose of this document is to assess the Eastside area need within King County using PSE’s latest load forecast and any improvements to PSE’s and surrounding transmission systems. This 2022 Needs Assessment supplements PSE’s annual system assessment, which is completed as part of PSE’s compliance with the North American Reliability Corporation (NERC) mandatory requirements. These requirements are detailed in NERC standard TPL-001-4 Transmission System Planning (TPL) Performance Requirements. PSE’s most recent NERC TPL Assessment was completed on December 31st, 2021. This assessment also meets the Decision Criteria as stated in Bellevue’s Land Use Code Sec. 20.20.255.

Per NERC requirements, PSE performs an annual planning assessment to analyze our electric system and identify system deficiencies, validate previous conclusions, and/or revise them based on updated information. The Eastside area is included in the annual assessment. As far back as the 2009 NERC TPL Planning Assessment, PSE indicated that there was a need in the Eastside area. More detailed studies in 2013 and again in 2015, by Quanta Technology/PSE confirmed the results of PSE’s internal transmission planning studies which concluded that the Energize Eastside project was needed by the winter of 2017/2018 and the summer of 2018 to meet federal reliability criteria<sup>3</sup>. After 2015, the TPL Assessments in 2016, 2017, 2018, 2019, 2020 & 2021 have confirmed that there is a transmission capacity deficiency which will continue to get worse as load grows. Additionally, the TPL Assessments have continued to demonstrate that the Energize Eastside project solved the transmission capacity deficiency. In the TPL Assessments, it has been demonstrated that when phase 1 of the project is in-service (Talbot-Richards Creek 230 kV lines), the deficiency would still exist which would be mitigated by the full project in-service (Talbot-Richards Creek 230 kV lines and Sammamish-Richards Creek 230 kV lines). In addition to PSE’s regular review of the system deficiencies that give rise to the Energize Eastside project, the need for this project has been independently evaluated. In December 2014, the City of Bellevue commissioned Utility Systems Efficiencies (USE) to peer review PSE’s transmission planning studies for the Eastside. The report was completed on April 28, 2015. The USE study stated that the Energize Eastside project is needed to serve projected increases in demand in Eastside.<sup>4</sup> Further, during the EIS process performed on the Energize Eastside proposal, the cities of Bellevue, Redmond, Newcastle, and Renton (collectively “Partner Cities”) hired Stantec to peer review the project need. Stantec’s review was completed on July 31, 2015. Stantec confirmed the methodology utilized and need conclusions drawn by both PSE and Quanta Technology.<sup>5</sup> Finally, the City of Newcastle hired MaxETA Energy, PLLC and Synapse Energy Economics, Inc. (MaxETA and Synaspe) to review the need, and that study, completed on June 28, 2020, concluded that there is a need, stating that the analysis “shows that there is a summer transmission capacity deficiency in King County under N-1-1 contingencies even at today’s peak load level.”<sup>6</sup>

This report, using the latest available load forecast and transmission system topology, continues to confirm that under mandatory NERC performance criteria, listed in NERC TPL-001-4 Table 1, there are

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<sup>3</sup> <https://energizeeastside.com/documents>

<sup>4</sup> [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/cob\\_independent\\_technical\\_analysis\\_1-3.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/cob_independent_technical_analysis_1-3.pdf), Page 5-6

<sup>5</sup> [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/stantec\\_review\\_memo\\_eastside\\_needs\\_assessment\\_report.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/stantec_review_memo_eastside_needs_assessment_report.pdf)

<sup>6</sup> *Assessment of Proposed Energize Eastside Project*, MaxETA Energy, PLLC and Synapse Energy Economics, Inc., June 2020, Page 3 Key Findings

reliability needs in the Eastside area in King County. The assumptions and results are also reflected in PSE's recently concluded 2021 NERC TPL Assessment.

## 2. Differences between Prior and 2022 Needs Assessments

This section summarizes the differences between the 2015 Supplemental Needs Assessment and 2022 Needs Assessment.

### 2.1. WECC Base Case Differences

Each year, the Western Electric Coordinating Council (WECC), in coordination with its members, develops a set of “base cases” to model the bulk electric system on the Western Interconnection. These base cases include the most up-to-date electrical system information for the entire WECC territory including updated loads, generators, transmission lines, etc. All electric providers in WECC's territory use these base cases as starting points to study their existing systems, develop proposed system improvements, and understand the potential impacts of their system on the regional electric grid, thereby ensuring no adverse impacts to the reliability and operating characteristics of its system or any surrounding system.

For the 2015 Needs Assessment analysis, PSE utilized WECC winter peak base cases for the years 2019-20 and 2023-24. A 2017-18 case was developed from the 2019-20 base case. Summer peak base cases included the 2020 and 2024 WECC base cases. A 2018 summer case was developed from the 2020 base case.

For the 2022 Needs Assessment analysis, PSE started with WECC winter peak base cases of 2021-22, 2025-26 and 2031-32 and modified the cases to represent 2022-23, 2026-27 and 2030-31 with the latest information available. Similarly for summer, PSE started with WECC Summer peak base cases of 2023, 2026 and 2031 and modified the cases to represent 2023, 2027 and 2031 with the latest information available.

### 2.2. Differences in Load Forecast Levels Utilized in the prior and 2022 Power Flow Simulations

The loads modeled in PSE's power flow simulations, which were used in developing the 2013 Eastside Needs Assessment Report, 2015 Supplemental Needs Assessment, 2022 Assessment and annual NERC TPL Assessments, are a combination of native load and transportation customer loads. The load levels modeled in PSE's power flow simulations are planning level loads. The native load forecast represents PSE native load customers. The transportation loads are transmission service loads that PSE is contractually obligated to supply to PSE's transmission customers.

The 2022 Needs Assessment includes a combination of the 2021 corporate load forecast for native load forecast and contractual transportation load forecasts.<sup>7</sup>

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<sup>7</sup> PSE's corporate native load forecasts are updated every year. For example, the corporate load forecast used in MaxETA and Synapse's study was from a 2018 corporate load forecast, which was lower than the 2021 corporate load forecast used in this study.

For the native load forecast, PSE develops forecasts of customers, usage, and peak using an econometric-time series approach. The forecast is derived using models for customer type, usage information sourced from PSE's historical electric demand history, weather, as well as local and national macroeconomic and demographic data. For historical peak demand, PSE's corporate load forecast also uses historical peak values, temperatures, system characteristics, and normalized monthly electric demand.

Below is a list of notable differences regarding results of the 2021 load forecast compared to the previous forecasts:

- a) The 2021 load forecast assumes economic impacts from COVID-19, similar to the 2020 load forecast. Load forecasts prior to 2020 did not assume COVID-19 impacts. Updated impacts are assumed to be less severe than were projected in the 2020 load forecast, resulting in stronger projected customer growth.
- b) The 2021 load forecast assumes the optimal amount of demand side resources resulting from the 2021 Integrated Resource Plan (IRP).
- c) The 2021 forecast includes impacts from Washington State's February 2021 update of residential building codes. This code change incentivizes residential builders to install electric space/water heating equipment over gas.
- d) The 2021 load forecast includes an independently sourced electric vehicle forecast from the consulting firm Guidehouse. The updated EV forecast is higher than the previous electric vehicle forecast. This is due to more light duty vehicles (resulting from Washington's zero-emissions vehicle law, adopted in 2020) and inclusion of medium- and heavy-duty vehicles.
- e) The 2021 load forecast utilizes an updated usage forecast which, compared to the previous forecast, projects similar levels of energy consumption in the residential and commercial classes before demand side resources and electric vehicles are included. After demand side resources and electric vehicles are included, the residential and commercial classes have higher projected usage.

For the transportation loads (PSE's transmission customers), in previous load forecasts, they were assumed to be 270 MW, which was the average scheduled flow of the transportation loads. For 2022 Needs Assessment, the transportation loads vary year to year and have a contractual value of 490 MW. The 2021 transportation loads are obtained from PSE's transmission customers' annual submission of their forecast data for ten years.



### 2.3. Major Topology Changes in the 2022 Needs Assessment Base Cases

The following projects were included or removed in the 2022 Needs Assessment for both summer and winter:

*Table 2.3-1: Base Case Topology Changes in 2022 Needs Assessment Cases*

<b>Facilities Removed</b>		
<b>Winter 2022-23/Summer 2023</b>	<b>Winter 2026-27/Summer 2027</b>	<b>Winter 2030-31/Summer 2031</b>
Tono 115/500 kV transformer out of service		
Centralia Generation #1 Retirement (Third Party)	Centralia Generation #1 & #2 Retirement (Third Party)	Centralia Generation #1 & #2 Retirement (Third Party)
Intalco Load Retirement (Third Party)	Intalco Load Retirement (Third Party)	Intalco Load Retirement (Third Party)
<b>Facilities Added</b>		
<b>Winter 2022-23/Summer 2023</b>	<b>Winter 2026-27/Summer 2027</b>	<b>Winter 2030-31/Summer 2031</b>
	Tono 115/500 kV transformer in service	Tono 115/500 kV transformer in service
	Sammamish-Juanita 115 kV line	Sammamish-Juanita 115 kV line
	Sedro Woolley-Bellingham #4 Reconductor	Sedro Woolley-Bellingham #4 Reconductor
	Bainbridge Island Improvement	Bainbridge Island Improvement
	Electron Heights-Enumclaw 55/115 kV Conversion	Electron Heights-Enumclaw 55/115 kV Conversion

### 2.4. Differences in Generation Configurations Utilized in the 2015 and 2022 Needs Assessment

Industry standards used to test the electrical transmission system performance incorporate various levels of available generation to stress the system under a range of conditions that demonstrate measurable system change. These are described below.

A minimum and maximum generation sensitivity was included in the study to represent the system with high and low generation output. This is completed to ensure the system is studied under a range of stressed conditions consistent with transmission planning assessments under NERC requirements.

For 2015 Needs Assessment:

- a) For Minimum generation sensitivity case, all of PSE generation offline
- b) For Maximum generation sensitivity case, all of PSE generation is online except Wind generation and Electron hydro generation was modeled online

For 2022 Needs Assessment:

- a) For Minimum generation sensitivity case, 145 MW of generation was kept online.
- b) For Maximum generation sensitivity case, all of PSE generation is online except for wind generation and Electron hydro generation, which was modeled offline

## 2.5. Northern Intertie

The Westside Northern Intertie flows for summer and winter values were modeled similar to the flows modeled in 2015 Needs Assessment study and NERC TPL Assessments. For the WECC base cases, the Westside Northern Intertie flow value for summer was between 2000 MW to 2100 MW north to south, and for winter, the flow value was 1500 MW south to north.

## 3. Data in 2022 Needs Assessment

### 3.1. Load Forecast Used in the 2022 Needs Assessment

Tables 3.1-1 and 3.1-2 show the winter (December) and summer (August) system and King County<sup>8</sup> planning level loads used in the 2022 Needs Assessment study, along with a comparison to the 2015 Supplemental Needs Assessment. As described in Section 2.2, the system planning level loads include native loads and contractual transportation loads.

*Table 3.1-1: PSE System and King County Planning Level Load Forecast Comparison for Winter – December*

Year	System Planning Level Load Forecast (December)		King County Planning Level Load Forecast (December)	
	Planning Loads for 2015 Study	Planning Loads for 2022 Study	Planning Loads for 2015 Study	Planning Loads for 2022 Study
2021	5,120	5,175	2,524	2,501
2022	5,133	5,187	2,535	2,508
2023	5,158	5,232	2,553	2,524
2024	5,231	5,274	2,596	2,541
2025	5,299	5,303	2,636	2,559
2026	5,355	5,316	2,671	2,564
2027	5,418	5,336	2,709	2,573
2028	5,494	5,357	2,756	2,583
2029	5,572	5,376	2,804	2,594
2030	5,646	5,397	2,850	2,604
2031	5,714	5,415	2,895	2,614
2032	5,782	5,469	2,940	2,641
2033	5,850	5,524		2,671
2034	5,919	5,576		2,699
2035		5,631		2,729

<sup>8</sup> In the context of the electrical network and planning models, there is no defined “Eastside area” due to interconnected nature of the grid, which does not align with any city or jurisdictional boundaries. For power flow modeling, King County growth represents growth in the eastside area and is the input for power flow modeling.

2036		5,705		2,768
2037		5,768		2,800
2038		5,796		2,816
2039		5,892		2,864
2040		5,970		2,902
2041		6,046		2,942
2042		6,125		

Table 3.1-2: PSE System and King County Planning Level Load Forecast Comparison for Summer – August

Year	System Planning Level Load Forecast (August)		King County Planning Level Load Forecast (August)	
	Planning Loads for 2015 Study	Planning Loads for 2022 Study	Planning Loads for 2015 Study	Planning Loads for 2022 Study
2021	3,649	4,025	1,891	2,033
2022	3,677	4,060	1,907	2,069
2023	3,718	4,128	1,931	2,102
2024	3,777	4,199	1,966	2,137
2025	3,851	4,250	2,009	2,170
2026	3,918	4,296	2,048	2,196
2027	3,980	4,343	2,085	2,221
2028	4,059	4,391	2,132	2,247
2029	4,142	4,438	2,181	2,272
2030	4,224	4,487	2,230	2,299
2031	4,303	4,535	2,279	2,326
2032	4,379	4,592	2,326	2,356
2033	4,468	4,658	2,382	2,393
2034	4,560	4,723		2,428
2035		4,788		2,463
2036		4,864		2,503
2037		4,941		2,544
2038		4,996		2,573
2039		5,082		2,617
2040		5,171		2,664
2041		5,256		2,707
2042		5,340		

The 2022 Needs Assessment used PSE’s 2021 corporate load forecast as the basis for the analyses and adjusted the load based on transportation loads supplied by PSE’s transmission customers. This 2021 corporate load forecast included an overall PSE native system forecast and also a sub-area load forecast for King County.

Table 3.1-4 lists the King County and System Planning level loads included in the cases for the 2015 Needs Assessment. Table 3.1-5 lists the King County and System Planning level loads included in the cases for the 2022 Needs Assessment.

*Table 3.1-3: 2015 Needs Assessment King County and System Planning Load Level*

Case	King County	Remainder of system	Total Planning Loads
17-18HW	2569	2592	5162
18HS	1917	1707	3625
20HS	1934	1747	3681
23-24HW	2581	2577	5158
24HS	2017	1800	3817

*Table 3.1-4: 2022 Needs Assessment King County and System Planning Load Level*

Case	King County	Remainder of system	Total Planning Loads
22-23HW	2508	2679	5187
26-27HW	2564	2755	5319
30-31HW	2604	2795	5398
23HS	2102	2025	4127
27HS	2221	2125	4346
31HS	2325	2211	4535

### 3.2. WECC Base Cases Used in the 2022 Needs Assessment

The WECC base cases are updated annually. The cases available for this update were Heavy Winter (HW) 2021-22, 2025-26 and 2030-31 and Heavy Summer (HS) 2023, 2026 and 2031. All other cases were derived from those WECC cases. Table 3-6 includes a comparison of the cases utilized in the 2015 Needs Assessment and the 2022 Needs Assessment study.

*Table 3.2-1: 2015 and 2022 Needs Assessment Cases Used (with 100% conservation levels)*

Case (with 100% Conservation))	2015	2022
<b>2017-18 HW SN</b>	x	
<b>2019-20 HW SN</b>	x	
<b>2023-24 HW SN</b>	x	
<b>2018 HS NS</b>	x	
<b>2024 HS NS</b>	x	
<b>2024 HS SN</b>	x	
<b>2022-23 HW</b>		X
<b>2026-27 HW</b>		X
<b>2030-31 HW</b>		X
<b>2022-23 HW SN + Min</b>		X
<b>2026-27 HW SN + Min</b>		X
<b>2030-31 HW SN + Min</b>		X

<b>2023 HS</b>		X
<b>2027 HS</b>		X
<b>2031 HS</b>		X
<b>2023 HS NS + Max</b>		X
<b>2027 HS NS + Max</b>		X
<b>2031 HS NS + Max</b>		X

Notes: HW → Heavy Winter, HS → Heavy Summer, SN → South to North Northern Intertie flows, NS → North to South Northern Intertie flows, Min → Minimum PSE generation, Max → Max PSE generation

## 4. Results of 2022 Needs Assessment

The detailed results of the 2022 Needs Assessment are shown in Appendix A for winter peak conditions and Appendix B for summer peak conditions. The results verified that there is a transmission capacity deficiency today during summer peak load and in 2030-31 during forecasted winter peak demand in the Eastside area of King County. The transmission capacity deficiency has existed for the last several years during summer peak season, as demonstrated by instances in the last five years in which peak demand exceeded the studied level at which PSE’s system is at risk of potential overloads under certain NERC credible contingencies which reduce operational flexibility and increase the chances of load shedding in the Eastside area of King County. This transmission capacity deficiency in the Eastside area is expected to increase with increasing load. Using the same methodology as the 2015 Needs Assessment, the 2022 Needs Assessment confirmed that a transmission capacity deficiency is present at the studied winter King County load level of 2604 MW in the winter of 2030-31, requiring the use of CAPs. The transmission capacity deficiency also develops at the studied summer King County area load level of 2102 MW in the summer of 2023 and gets worse at the studied King County load level of 2325 MW in the summer of 2031, requiring the use of CAPs and exposing some PSE customers to a risk of load shedding.

There are still a number of transmission transformer overloads which cannot be addressed by re-dispatching generation, similar to what was shown in the 2015 Needs Assessment results. These transformer overloads will require CAPs to shift load, and depending on the scenario, to utilize load shedding in order to remain NERC compliant.

### 4.1. Winter Analysis

Figure 4-1 shows the 2022 and 2015 studied planning load levels on the graph as dashed red and yellow lines and the 2022 planning load forecast as the blue dashed line. The studied planning load level line highlights the area of concern where the 2022 Needs Assessment indicates violations of the mandatory NERC performance requirements developed for certain contingencies that put customer reliability at risk. The area of concern was seen at the studied King County area load of 2604 MW in the winter of 2030-31 and the studied system planning load level is 5398 MW which may require the use of CAPs to manage overloads. As shown in the winter summary in Table 4.1-1, CAPs are needed in Year 10.

Figure 4-1 King County Winter Peak Planning Level Load Forecast and Studied Load Level Limit

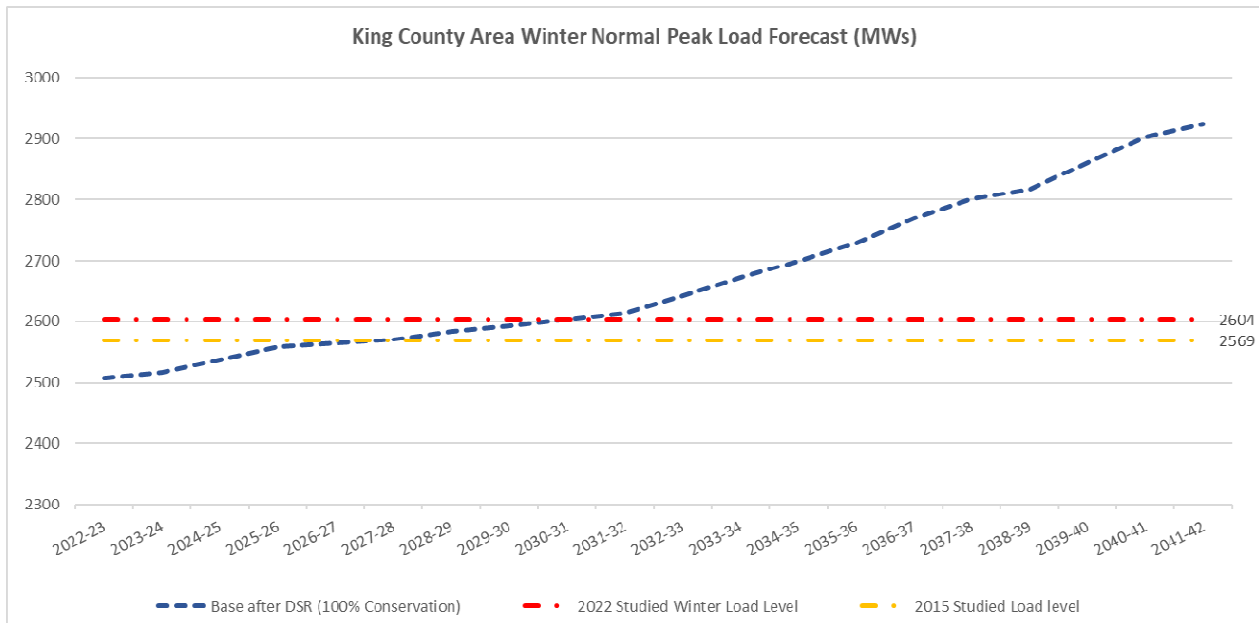


Table 4.1-1 2022 Winter Power Flow Summary

Winter Powerflow Summary						
	Base			Sensitivity		
Year	2022-23	2026-27	2030-31	2022-23	2026-27	2030-31
System Planning Load	5187	5319	5398	5187	5319	5398
King Planning Load	2508	2564	2604	2508	2564	2604
<b>Elements Above Emergency Limit:</b>						
N-1	0	0	0	0	0	0
N-1-1	0	0	1	0	0	5
Corrective Action Plans Required	No	No	Yes	No	No	Yes

#### 4.2. Summer Analysis

Like the Winter Analysis in Section 4.1, Figure 4-2 shows the 2022 and 2015 studied planning load levels on the graph as dashed red and yellow lines and the 2022 planning load forecast as the blue dashed line. The 2022 Needs Assessment showed that for the summer season, a transmission capacity deficiency was seen at the studied King County Planning Load Level at 2102 MW, and the System Planning load level of 4127 MW. The King County Planning Load level of 2102 MW for summer requires the use of CAPs to manage overloads in all the cases. Some of the CAPs under

certain scenarios puts approximately 50,000 eastside customers at risk of load shedding since they would be radially fed<sup>9</sup> for a long period of time.

Figure 4-2 King County Summer Peak Planning Level Load Forecast and Studied Load Level Limit

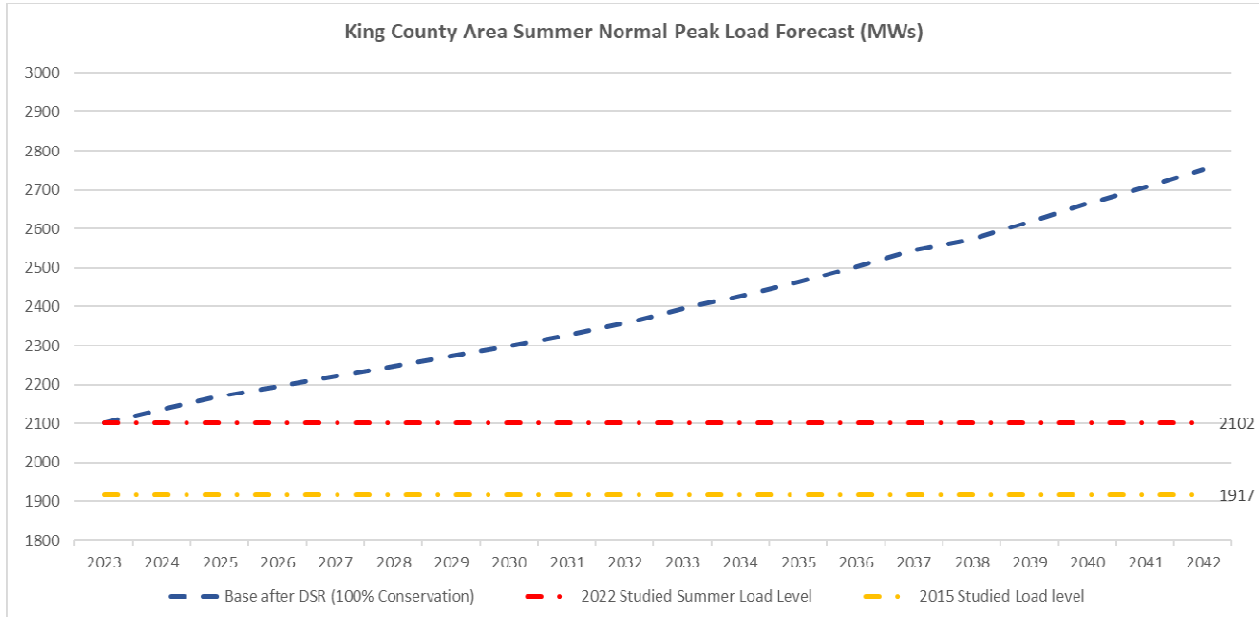


Table 4.2-1 summarizes the results of the 2022 Needs Assessment for summer season and shows that CAPs are needed today.

Table 4.2-1 2022 Summer Power Flow Summary

Summer Powerflow Summary						
	Base			Sensitivity		
Year	2023	2027	2031	2023	2027	2031
System Planning Load	4127	4346	4535	4127	4346	4535
King Planning Load	2102	2221	2325	2102	2221	2325
<b>Elements Above Emergency Limit:</b>						
N-1	1	1	3	1	1	3
N-1-1	5	5	5	5	5	5
Corrective Action Plans Required	Yes	Yes	Yes	Yes	Yes	Yes

<sup>9</sup> Radially fed systems only have one power source and therefore, but those customers on that system at high risk for outages.

## 5. Conclusion

The 2022 Needs Assessment, which uses the 2022 planning load level forecast, shows similar conclusions to the 2015 assessment and shows there is still an Eastside area transmission capacity deficiency, or need, on PSE's system. For the summer season, the date of the need is today, and for winter season, the date of need is 2031. All the summer power flow cases and 2030-31 winter power flow cases still require the use of CAPs to mitigate transmission transformer overloads. The number of contingencies requiring the use of CAPs steadily increases as load increases, as seen in Table 4.2-1. Load shedding becomes an increasingly necessary action as load and incremental block loads continue to grow.

## 6. Statement of Need

The 2022 Needs Assessment reconfirmed that, for summer season today, there is a transmission capacity deficiency on the Eastside which impacts PSE customers and communities in and around Kirkland, Redmond, Bellevue, Issaquah, Newcastle, and Renton along with Clyde Hill, Medina, and Mercer Island as well as other communities in north King County. The transmission capacity deficiency focuses on the two 230 kV supply injections into central King County at Sammamish Substation in Redmond and Talbot Hill Substation in Renton. As shown in results summarized in Table 4.1-1 above, there is already a transmission capacity need today in the summer and at a King County summer load level of 2102 MW. CAPS are required at this level, putting approximately 50,000 Eastside customers at risk of outages. As shown in results summarized in Table 4.2-1 above, by winter of 2030-31, at a King County load level of 2604 MW, overloads will result in operating conditions that require CAPs to manage.



# Appendix A. 2022 Needs Assessment results for Winter Peak Season

Table A-1 Summary of Potential Thermal Violations for Winter Peak Load

Winter Results	Year	Base Winter				Winter Sensitivity - Min Generation			
		2022-23	2026-27	2030-31	Year 10	2022-23	2026-27	2030-31	Year 10
	System Load	5187	5319	5398	Year 10	5187	5319	5398	Year 10
	King County Load	2508	2564	2604	Year 10	2508	2564	2604	Year 10
	PSE Generation	1652	1676	1712	Year 10	144.8	144.9	145.1	Year 10
	NI Flows	1402	1391	1343	Year 10	1511	1500	1504	Year 10
<b>Contingency</b>									
<b>P1 RESULTS</b>									
	Talbot #2 115/230 kV - 83%	Talbot #2 115/230 kV - 84%	Talbot #2 115/230 kV - 81%	Talbot #2 115/230 kV - 89%	Talbot #2 115/230 kV - 91%	Talbot #2 115/230 kV - 93%	Talbot #2 115/230 kV - 89%	Talbot #2 115/230 kV - 89%	Talbot #2 115/230 kV - 89%
<b>P2+ RESULTS</b>									
	Talbot #2 115/230 kV - 83%	Talbot #2 115/230 kV - 85%	Talbot #2 115/230 kV - 77%	Talbot #2 115/230 kV - 91%	Talbot #2 115/230 kV - 91%	Talbot #2 115/230 kV - 94%	Talbot #2 115/230 kV - 122%	Talbot #2 115/230 kV - 122%	Talbot #2 115/230 kV - 118%
	Berrydale 115/230 kV - 79%	Berrydale 115/230 kV - 82%	Berrydale 115/230 kV - 99%	Berrydale 115/230 kV - 89%	Berrydale 115/230 kV - 89%	Berrydale 115/230 kV - 90%	Berrydale 115/230 kV - 118%	Berrydale 115/230 kV - 118%	Berrydale 115/230 kV - 118%

P6 RESULTS							
Winter Results	Year	Base Winter			Winter Sensitivity - Min Generation		
		2022-23	2026-27	2030-31	2022-23	2026-27	2030-31
	System Load	5187	5319	5398	5187	5319	5398
	King County Load	2508	2564	2604	2508	2564	2604
	PSE Generation	1652	1676	1712	145	145	145
	NI Flows	1402	1391	1343	1511	1500	1504
	Contingency	Year 1	Year 5	Year 10	Year 1	Year 5	Year 10
		Talbot-Lakeside #1 115 KV - 79%	Talbot-Lakeside #1 115 KV - 76%	Talbot-Lakeside #1 115 KV - 76%	Talbot-Lakeside #1 115 KV - 100%	Talbot-Lakeside #1 115 KV - 99%	Talbot-Lakeside #1 115 KV - 109%
		Talbot-Lakeside #2 115 KV - 78%	Talbot-Lakeside #2 115 KV - 76%	Talbot-Lakeside #2 115 KV - 76%	Talbot-Lakeside #2 115 KV - 100%	Talbot-Lakeside #2 115 KV - 99%	Talbot-Lakeside #2 115 KV - 108%
		Talbot-Paccar 115 KV - 74%	Talbot-Paccar 115 KV - 75%	Talbot-Paccar 115 KV - 74%	Talbot-Paccar 115 KV - 89%	Talbot-Paccar 115 KV - 90%	Talbot-Paccar 115 KV - 95%
		Talbot Hill #1 115/230 KV - 92%	Talbot Hill #1 115/230 KV - 94%	Talbot Hill #1 115/230 KV - 97%	Talbot Hill #1 115/230 KV - 102%	Talbot Hill #1 115/230 KV - 103%	Talbot Hill #1 115/230 KV - 106%
		Talbot Hill #2 115/230 KV - 97%	Talbot Hill #2 115/230 KV - 99%	Talbot Hill #2 115/230 KV - 98%	Talbot Hill #2 115/230 KV - 107%	Talbot Hill #2 115/230 KV - 108%	Talbot Hill #2 115/230 KV - 107%
		Sammamish #2 115/230 KV - 91%	Sammamish #2 115/230 KV - 95%	Sammamish #2 115/230 KV - 97%	Sammamish #2 115/230 KV - 88%	Sammamish #2 115/230 KV - 91%	Sammamish #2 115/230 KV - 92%
		Sammamish #1 115/230 KV - 92%	Sammamish #1 115/230 KV - 95%	Sammamish #1 115/230 KV - 98%	Sammamish #1 115/230 KV - 88%	Sammamish #1 115/230 KV - 91%	Sammamish #1 115/230 KV - 92%
		Berrydale 115/230 KV - 87%	Berrydale 115/230 KV - 90%	Berrydale 115/230 KV - 100%	Berrydale 115/230 KV - 98%	Berrydale 115/230 KV - 99%	Berrydale 115/230 KV - 110%

# Appendix B. 2022 Needs Assessment results for Summer Peak Season

Table B-1 Summary of Potential Thermal Violations for Summer Peak Load

		P1 RESULTS									
		Base Summer					Summer Sensitivity - Full Generation				
Year		2022	2027	2031	2022	2027	2031	2022	2027	2031	
<b>Summer Results</b>	System Load	4127	4346	4535	4127	4346	4535	4127	4346	4535	
	King County Load	2102	2221	2325	2102	2221	2325	2102	2221	2325	
	PSE Generation	1532	1530	1534	1578	1578	1578	1578	1578	1579	
	NI Flows	2049	1799	1832	2071	2035	2057	2071	2035	2057	
<b>Contingency</b>		<b>Year 1</b>	<b>Year 5</b>	<b>Year 10</b>	<b>Year 1</b>	<b>Year 5</b>	<b>Year 10</b>	<b>Year 1</b>	<b>Year 5</b>	<b>Year 10</b>	
		Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	Sammamish #2 115/230 kV - #2 115/230 kV	
		91%	97%	101%	92%	93%	101%	92%	93%	101%	
		Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	Sammamish #1 115/230 kV - #1 115/230 kV	
		91%	97%	101%	92%	96%	101%	92%	96%	101%	
		Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	Monroe- Novelty 230kV	
		127%	125%	129%	128%	128%	129%	128%	128%	133%	
		<b>P2+ RESULTS</b>									
		Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	Novelty 115/230 -	
		103%	100%	110%	100%	105%	110%	100%	105%	110%	
		Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	Monroe- Novelty 230 kV	
		- 107%	- 107%	- 111%	- 105%	- 108%	- 111%	- 105%	- 108%	- 114%	

P6 RESULTS									
Summer Results	Year	Base Summer				Summer Sensitivity - Full Generation			
		2022	2027	2031	2031	2022	2027	2031	2031
	System Load	4127	4346	4535	4535	4127	4346	4535	4535
	King County Load	2102	2221	2325	2325	2102	2221	2325	2325
	PSE Generation	1532	1530	1534	1534	1578	1578	1579	1579
	NI Flows	2049	1799	1832	1832	2071	2035	2057	2057
	<b>Contingency</b>								
		Sammamish #2 115/230 kV - 127%	Sammamish #2 115/230 kV - 130%	Sammamish #2 115/230 kV - 141%	Sammamish #2 115/230 kV - 141%	Sammamish #2 115/230 kV - 123%	Sammamish #2 115/230 kV - 134%	Sammamish #2 115/230 kV - 142%	Sammamish #2 115/230 kV - 142%
		Sammamish #1 115/230 kV - 127%	Sammamish #1 115/230 kV - 130%	Sammamish #1 115/230 kV - 141%	Sammamish #1 115/230 kV - 141%	Sammamish #1 115/230 kV - 124%	Sammamish #1 115/230 kV - 134%	Sammamish #1 115/230 kV - 142%	Sammamish #1 115/230 kV - 142%
		Novelty 115/230 kV - 112%	Novelty 115/230 kV - 103%	Novelty 115/230 kV - 106%	Novelty 115/230 kV - 106%	Novelty 115/230 kV - 102%	Novelty 115/230 kV - 107%	Novelty 115/230 kV - 111%	Novelty 115/230 kV - 111%
		Beverly Park- Cottage Brook 115 kV - 105%	Beverly Park- Cottage Brook 115 kV - 104%	Beverly Park- Cottage Brook 115 kV - 108%	Beverly Park- Cottage Brook 115 kV - 108%	Beverly Park- Cottage Brook 115 kV - 103%	Beverly Park- Cottage Brook 115 kV - 105%	Beverly Park- Cottage Brook 115 kV - 109%	Beverly Park- Cottage Brook 115 kV - 109%
		Novelty 115/230 kV - 102%	Novelty 115/230 kV - 114%	Novelty 115/230 kV - 122%	Novelty 115/230 kV - 122%	Novelty 115/230 kV - 110%	Novelty 115/230 kV - 113%	Novelty 115/230 kV - 123%	Novelty 115/230 kV - 123%

## Pittman, Reilly

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Friday, September 8, 2023 5:11 AM  
**To:** Pittman, Reilly; Stead, Elizabeth  
**Cc:** Norm Hansen; Robinson, Lynne; Nieuwenhuis, Jared; Barksdale, Jeremy; Lee, Conrad; Robertson, Jennifer S.; Stokes, John; Zahn, Janice; bradley.strauch@pse.com; Donovan, Jackie  
**Subject:** PSE July 11, 2023 letter to Reilly Pittman providing an update to the August 2022 Project Need is not legitimate  
**Categories:** Need

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Mr. Pittman and Ms. Stead-

On July 11, 2023 PSE sent a letter to Reilly Pittman providing an update to the August 2022 Project Need. That letter has numerous problems. Note:

1) The letter provides information on FERC Orders, Orders in other cities, consultant reports for other proceedings, WUTC Orders, etc. But none of those Orders and other documents relate to what PSE is required to do in order to get a permit from the City of Bellevue to allow them to build Energize Eastside in North Bellevue. The City of Bellevue must comply with their own code requirements. As stated in my July 18, 2023 email (and its attachment) to Mr. Pittman and Ms. Stead, **PSE is not able to meet the City of Bellevue requirements for permitting Energize Eastside in North Bellevue.**

2) The letter also mischaracterizes what the WUTC has said about Energize Eastside. The WUTC Order in that proceeding simply adopted a Settlement Agreement proposal floated by PSE in that proceeding. That Settlement Proposal asked the WUTC to allow them to put \$100 million that they had spent (up to that time) into rates, with the understanding that the WUTC had not ruled that Energize Eastside was a prudent investment. The Settlement Agreement stated that PSE expected to spend another \$200 million to actually build Energize Eastside over the next several years. The Settlement Agreement stated that a Full Prudency Review would be conducted when the project was completed, and if it was determined at the time that the project was not prudent based on the WUTC 4 criteria for determining prudency, then PSE would need to refund all money the \$100 million that was put in rates. The WUTC Order in that agreement acknowledged that I had provided evidence that PSE had not met any of these 4 criteria, but the WUTC adopted the Settlement Agreement proposal that the matter would be properly examined in a hearing when the project was complete and operating.

3) The letter also mischaracterizes that FERC has said about Energize Eastside. FERC has stated that they have never examined the need for Energize Eastside and never stated that Energize Eastside was needed.

4) The letter mischaracterizes that MaxETA/Synapse stated in their report for the City of Newcastle. That report found no winter problem that needed to be fixed by building Energize Eastside. That report stated that PSE had determined that there was a summer Bulk System reliability problem that needed to be fixed by building Energize Eastside. MaxETA/Synapse itself did not find that problem. Such a Bulk System reliability

problem would need to be addressed by PSE, Seattle City Light, Bonneville Power, Tacoma City Light, Snohomish PUD and others. None of these other utilities had ever heard of such a problem and there is no evidence that building Energize Eastside would solve such a problem ever if it exists.

**Conclusion: The City of Bellevue needs to determine if Energize Eastside meets its own code requirements. As I have previously pointed out (see 1 above). PSE is not able to meet the City of Bellevue requirements for permitting Energize Eastside in North Bellevue.**

Richard Lauckhart  
Consultant for CENSE and past VP of Power Planning for Puget  
44475 Clubhouse Drive, El Macero, CA 95618  
916-769-6704

## Pittman, Reilly

---

**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Wednesday, September 6, 2023 10:34 AM  
**To:** Pittman, Reilly; Stead, Elizabeth  
**Cc:** Norm Hansen; Robinson, Lynne; Nieuwenhuis, Jared; Barksdale, Jeremy; Lee, Conrad; Robertson, Jennifer S.; Stokes, John; Zahn, Janice; bradley.strauch@pse.com; Donovan, Jackie  
**Subject:** The City of Bellevue needs to require PSE to provide load flow modeling input and output data files for its updated Energize Eastside Needs Assessment...

**Categories:** Need

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Mr. Pittman and Ms. Stead

In August 2022 PSE provided a 2022 Energize Eastside Needs Assessment Update. Apparently, the load flow models were updated.

### **The City of Bellevue needs to require PSE to provide the following files for these updated load flow model runs:**

1. **areatie.lst**
2. **buslist.lst**
3. **flow.lst**
4. **owner.lst**
5. **summary.lst**

Without these files for these load flow model runs, there is no way to tell if the runs were properly performed.

i have received these files for the PSE original Needs Assessments done in 013 and 2015. When I examined those files I found shocking problems with those input files. I provided those findings to you in this proceeding in my July 18, 2023 email to Mr. Pittman and Ms. Stead.

**Please require PSE to provide me these files from their updated load flow model runs before Staff makes their recommendation to the Hearing Officer.**

Richard Lauckhart  
Consultant for CENSE and past VP of Puget  
44475 Clubhouse Drive  
El Macero, CA 95618  
916-769-6704

## Pittman, Reilly

---

**From:** Barbara Hughes <barbara\_hughes@hotmail.com>  
**Sent:** Friday, August 25, 2023 9:43 AM  
**To:** Pittman, Reilly  
**Cc:** Hansennp@aol.com; Warren Halvorsen; pamjjo@msn.com; ljlopezmsl@gmail.com; pindabazley@hotmail.com; williambarnesconsulting@gmail.com; r\_g\_hughes@hotmail.com; Don Marsh  
**Subject:** PSE Energize Eastside North Segment (Bridle Trails)  
**Categories:** SEPA

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Mr. Pittman,

I am writing to request that the EIS for this project be fully updated given the many years since it was produced. I remain concerned that PSE should look further into modern alternatives to the proposed new overground powerlines – undergrounding, battery, solar, wind, hydro and other alternatives.

I am a 21 year resident of Bridle Trails. It is where I raised my family. Bridle Trails is a unique natural area and I object to the impact of this project on trees, the forest understory and the many animals that live there. Bridle Trails should be preserved for future generations.

I was out of town for your recent public meeting, as are many folks in summer. Frankly, I considered that this project must be on hold or dead as there has been no movement for so long. In fact, I only know that you held a public meeting as I heard it from another resident, retrospectively. I haven't seen my past mail yet, and I do wonder if many of my Bridle Trails neighbors have been busy traveling this summer and so unawares...

Please add my objection and request to your project file/record and keep me updated on this project.

Thank you,

Barbara Hughes  
13709 NE 48<sup>th</sup> Pl  
Bellevue 98005



## Pittman, Reilly

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**From:** Kristi Weir <khweir@hotmail.com>  
**Sent:** Monday, August 21, 2023 7:10 AM  
**To:** Pittman, Reilly  
**Subject:** Fwd: Puget Sound Project North Segment  
**Attachments:** ECAM comments on PSE North Segment.docx; Sierra Club Comments on Energize Eastside North Segment.pdf; Sierra Club Comments on EIS Energize Eastside Supplemental EIS.pdf

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Mr. Pittman,

Attached are the comments by the Earth and Climate Action Ministry (ECAM) of East Shore Unitarian Church located in Bellevue regarding PSE's Energize Eastside Project--North Segment.

Kristi Weir  
Earth and Climate Action Ministry  
East Shore Unitarian Church

[khweir@hotmail.com](mailto:khweir@hotmail.com)

Below are Sierra Club comments already submitted which ECAM supports.



August 21, 2023

Reilly Pittman  
Environmental Planning Manager  
Development Services Department  
450 100<sup>th</sup> Ave NE  
Bellevue, WA 98004

[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)

RE: Puget Sound Energy's Energize East Side Project North Segment

The Earth and Climate Action Ministry (ECAM) of East Shore Unitarian Church located in Bellevue opposes the approval of the proposed North Segment of Energize Eastside Project. It is not good stewardship of the earth's resources in addressing environmental issues and it unfairly impacts some of the areas of the city with less tree canopy already

Poor stewardship of resources:

1. PSE has not shown the project is still needed. With the completion of the South Segment and the new 230kV transformer, the grid has sufficient capacity for the next decade.
2. These resources could better used to make more significant gains in energy efficiency and resiliency with other technologies and approaches. PSE has been too focused on meeting its dubious scenario of increased demand instead of finding ways to increase efficiency which would reduce or slow growth in demand.

Examples of alternative technologies would be use of batteries and solar, demand response

3. The North Segment project would be committing vast resources to a long-term capital project of traditional technology thereby reducing PSE's ability to respond to changing technology, markets, and legislation. For example, the recent passage of Inflation Reduction Act provides funding for clean energy projects—like solar and storage. However, the North Segment would not qualify.

Environmental Justice:

1. There is a planned removal of 70% of the mature trees in the corridor--a corridor that already has some of the lowest tree canopy in Bellevue, increasing the heat island even further.
2. The corridor also has some of the lower income census blocks for Bellevue. This project will unfairly impact those already dealing with higher temperatures with the concomitant impact on their health, with the disruption during construction, and with the loss of being near trees.
3. The increase in electricity rates due to the North Segment Project will be a relatively bigger burden for lower income families and is not justified when there are more efficient ways to meet our energy needs.

We feel that PSE's North Segment Project is an inefficient way to meet our environmental challenges and unfairly impacts a vulnerable community. We agree with Sierra Club's five reservations about the project. We also support the Sierra Club's recommended areas to be examined in the Supplemental EIS.

Kristi Weir,  
Earth and Climate Action Ministry  
East Shore Unitarian Church  
Bellevue WA

## Pittman, Reilly

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**From:** Steve Funk <xfunk@comcast.net>  
**Sent:** Saturday, August 12, 2023 2:28 PM  
**To:** Pittman, Reilly; donmmarsh@hotmail.com  
**Subject:** Energize Eastside

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I am J.Stephen Funk, roughly fifty years ago a member for years and then Chairman of the Bellevue Planning Commission. It was an educational experience observing business powers push through profit oriented projects ignoring the concerns and well being of local home owners. The Bellevue Comprehensive Plan required that "Single Family Residential Areas shall be preserved and protected."

But that requirement sometimes was lost in the search for profit, and the City Council at times was led astray despite the Planning Commission analysis. I can see our city still sometimes can be dragged out of its path and its duty to citizens.

If I were involved in deciding the city's course regarding the current Puget Power plan I'd be reluctant and cautious. The citizens are designated victims with a certainty of loss and expense and no proven likelihood of gain. Puget Power cannot be the decider.

J. Stephen Funk

## Pittman, Reilly

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**From:** Phil Ritter <philr@sonic.net>  
**Sent:** Wednesday, August 9, 2023 2:32 PM  
**To:** Pittman, Reilly  
**Subject:** Energize Eastside - North Segment  
**Attachments:** Letter to City of Bellevue 8-9-23.pdf; Sierra Club Comments on Energize Eastside North Segment.pdf; Sierra Club Comments on Energize Eastside Supplemental EIS.pdf

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

See attached

Please confirm receipt.

**350 Eastside  
1737 211<sup>th</sup> Place NE  
Sammamish, WA 98074**

August 9, 2023

Reilly Pittman  
Environmental Planning Manager  
Development Services Department  
450 100th Ave NE  
Bellevue, WA 98004

RE: Energize Eastside – North Segment

Dear Mr Pittman:

Our organization is in total support of the comments attached from the Sierra Club and we request that you give them serious consideration.

1. We all care about affordable energy. PSE's project would cost over \$100 million, increasing electric bills for every PSE customer for many decades to come.
2. Profit driven companies that supply essential services must be transparent and accountable. PSE has no recent analysis to show the North Segment serves a documented need, especially now that the South Segment of the transmission line has been completed.
3. We care about vulnerable populations. The project would require removal of hundreds of mature trees in some of the least affluent and most diverse neighborhoods in Bellevue. The Supplemental EIS should clarify whether this would intensify existing heat islands and increase health risks in nearby vulnerable communities.
4. Climate change is an existential crisis that impacts all our plans. However, PSE's project is based on outdated modeling and assumptions that do not account for the impacts of climate change.
5. Our elected representatives are taking steps to address climate change. New laws, like Washington's Clean Energy Transformation Act and the U.S. Inflation Reduction Act, will make modern alternatives cleaner and cheaper than PSE's proposal. These changed regulations and incentives should be considered in PSE's analysis and the Supplemental EIS.

Best regards,

Phil Ritter, CPA  
Sammamish, WA  
707-481-0984

DSD 003063

## Pittman, Reilly

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**From:** jankeller3@gmail.com  
**Sent:** Monday, August 7, 2023 2:40 PM  
**To:** Pittman, Reilly  
**Subject:** Energize Eastside permits, #21-104991-LB (CUP) and #21-104989-LO (CALUP)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Reilly Pittman and other reviewers of the Energize Eastside permits,

I am writing because I am concerned about elements that are insufficient or absent from the Energize Eastside “North Segment” permit applications:

- Conditional Use Permit File # 21-104991-LB (CUP)
- Critical Areas Land Use Permit File # 21-104989-LO (CALUP)

I am concerned because the above permit applications **have elements that are significantly outdated**, which means the applications **lack important information that would be included if those elements were actually up-to-date**. For one thing, the background studies and EIS do not include up-to-date discussions of current impacts or current alternatives (which must be included in such an application). In addition, the applications do not meet criteria for siting electrical facilities in the city, specifically the requirements that "an operational need exists" (based on today's data, not outdated projections from the past) and that "the proposed electrical utility facility improves reliability" as certified by the applicant's engineer. ([Codes section 20.20.255.E, parts 3 and 4](#) ).

These permit applications are important, because they are for a significant project that, if allowed, would seriously damage the city's tree canopy—destroying mature trees—at a time when we desperately need the canopy to be protected. The project would also be very expensive, and is out-of-step with the current realities of climate change. Those current realities include frightening weather events around the world, plus significant State and Federal legislation aimed at protecting trees and increasing clean energy technologies such as solar, battery storage, and demand response technologies. The Energize Eastside project runs counter to the realities, and counter to the aim of all this legislation.

More detail is provided below.

### OUTDATED OR MISSING ELEMENTS IN THE PERMIT APPLICATION OR EIS

For proposed Federal transmission projects, the studies used for supporting evidence are **supposed to be no older than five years**, unless no significant changes have happened within that time. The Federal standard seems very appropriate in this case. But PSE's latest publicly available studies **are eight years old**, dating back to 2015. Large, significant changes have happened since then. Here are some examples of what is missing from the Energize Eastside permit application and/or EIS because they are so old:

- **Evaluation of climate change impacts** in terms of the **need to preserve mature trees and prevent heat-island effects across Bellevue, but especially in vulnerable communities** in areas near where the mature trees would be destroyed. Climate change impacts were only incorporated into PSE's modeling in 2022, so these impacts are clearly missing from the permit applications.

Specifically, the EIS does not quantify or even mention the cooling potential of the trees PSE proposes to remove. King County produced a heat map in 2022 that shows high levels of heat in areas where Energize Eastside, if allowed, would destroy many mature trees. The EIS should determine whether these impacts are

significant. PSE proposes planting small trees, but the EIS should state how much those small trees would actually mitigate the heat island issue.

- **Evaluation of power needs for the North Segment, now that the South Segment provides a fifth 230 kV transformer.** The permit application should state under what conditions the North Segment would actually avoid power outages (the stated reason for building Energize Eastside in the first place), given that the South Segment now provides a fifth 230 kV transformer. This information is completely missing.
- **Evaluation of climate change impacts in terms of warmer winters and reduced peak loads in winter.** The permit application and/or EIS should evaluate whether the North Segment is still needed to serve winter peaks. Old data does not reflect what has been happening with peak loads in winter, which have been decreasing. The justification for Energize Eastside must be reviewed in terms of current data.

Note that if PSE makes a claim that the North Segment is needed only for summer peaks, the EIS must evaluate how solar panels and batteries might feasibly meet the need. The original EIS completely lacks such evaluation, but for summer peaks, solar panels are extremely likely to be less costly and less destructive than a transmission upgrade.

- **An updated evaluation of alternatives such as solar panels and batteries, given the decreased costs and increased available subsidies.** One of the purposes of studies that provide supporting evidence for a project like this is to compare the proposed project to alternatives. PSE's old studies have become completely outdated in this respect. They lack any useful, up-to-date comparison with alternatives such as solar panels and batteries. These alternatives are much less expensive than in 2015, and subsidies are available from the federal Inflation Reduction Act. The original cost comparisons in PSE's studies are simply not useful for evaluating this project any more.

On top of this, PSE is now acquiring these important technologies (batteries, solar panels, and also demand response, such as Time Varying Rates for electricity) to meet the demands of Washington's Clean Energy Transformation Act. This makes the original cost comparisons even less useful for evaluating this project. Is this transmission project necessary, given that legislation is pushing and supporting the community and PSE to move toward alternatives, that is, the clean energy technologies that we need? We cannot tell from the old studies.

- **An evaluation of the actual need (not the original supposed need) for transfers of electricity to Canada and California.** Significant changes have happened in this respect. Canada no longer relies on electricity from the U.S. to keep their lights on in the winter. Also, big transfers to California in the summer are less needed, because California has so much solar now that its price for electricity often goes negative. A thorough update and re-assessment of these transmission needs is necessary for the EIS and the permit application. Otherwise, they must be considered incomplete.

There are other problems with the old, outdated information in the permit application/EIS, but the ones I list above stand out. I urge you to deny the Energize Eastside "North Segment" permit application as it stands, and require these problems to be addressed. PSE must be required to provide up-to-date information in areas where there has clearly been significant, relevant change since the data for the application and/or EIS was compiled.

Thank you.

Jennifer Keller  
115 - 146th Ave SE, Bellevue, 98007



## Pittman, Reilly

---

**From:** Jim Dennison <jim.dennison@sierraclub.org>  
**Sent:** Tuesday, August 1, 2023 12:31 PM  
**To:** Pittman, Reilly  
**Cc:** Don Marsh  
**Subject:** Sierra Club Comments on Energize Eastside  
**Attachments:** Cover Letter - Sierra Club Energize Eastside Comments 7-26-23.pdf; Sierra Club Comments on Energize Eastside North Segment.pdf; Sierra Club Comments on Energize Eastside Supplemental EIS.pdf

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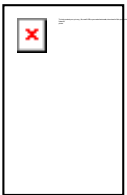
Good afternoon,

Please find attached the Sierra Club's Comments to the City of Bellevue on Puget Sound Energy's proposed Energize Eastside Project, North Segment, and the Sierra Club's separate comments on the Supplemental Environmental Impact Statement for the project.

Please let me know if you have any questions or concerns. Thank you.

Sincerely,  
Jim Dennison

--



**Jim Dennison**  
Associate Attorney  
Sierra Club  
he/him  
435-232-5784 | Mountain Time  
[jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)

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*SUBMITTED VIA EMAIL*

July 26, 2023

Reilly Pittman  
Environmental Planning Manager  
Development Services Department  
450 100<sup>th</sup> Ave NE  
Bellevue, WA 98004  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)

**Re: Puget Sound Energy, Energize Eastside Project**

Please find enclosed the Sierra Club's Comments to the City of Bellevue on Puget Sound Energy's proposed Energize Eastside Project, North Segment, and the Sierra Club's separate comments on the Supplemental Environmental Impact Statement for the project. Please let me know if you have any questions or concerns. Thank you.

Dated July 26, 2023.

Respectfully submitted,

*/s/ Jim Dennison* \_\_\_\_\_

Jim Dennison  
Associate Attorney  
1650 38<sup>th</sup> Street, #102 W  
Boulder, CO 80301  
Telephone: (435) 232-5784  
Email: [jim.dennison@sierraclub.org](mailto:jim.dennison@sierraclub.org)

Enclosures

DSD 003067

# PROPOSED AREAS OF FOCUS FOR THE SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS)

July 23, 2023

The Sierra Club acknowledges and supports the City of Bellevue's initiative to revise the 2015 Environmental Impact Statement (EIS) for Puget Sound Energy's (PSE) Energize Eastside transmission upgrade project. We applaud the City's commitment to publish a Supplemental EIS (SEIS) and recommend an in-depth examination of energy, environmental, and equity laws and regulations that have changed since the original EIS.

Outlined below are specific areas we believe should be examined in the SEIS for a fuller understanding of the North Segment project's costs, benefits, and potential impacts.

## 1. IMPACT OF THE CLEAN ENERGY TRANSFORMATION ACT

Considering recent catastrophic heatwaves and the important role of mature trees in mitigating their effects, we recommend studying the potential impacts of PSE's proposal to remove 70% of the mature trees in the Central Bellevue transmission corridor.

In many cities, poorer neighborhoods have fewer mature trees than affluent neighborhoods. Poorer Census Block Groups near the Energize Eastside utility corridor are also some of the hottest parts of the city. For example, residents of Census Block Group 53033.23603.3 earn less than half the median income in Bellevue and, on a hot afternoon, endure temperatures more than 10 degrees higher than neighborhoods with more shade.

In May 2019, four years after the Energize Eastside EIS was completed, Washington's governor signed the Clean Energy Transformation Act (CETA), which requires PSE to consider the benefits and burdens on vulnerable populations in its plans:

*RCW 19.405.010-6 The legislature recognizes and finds that the public interest includes, but is not limited to: The equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health, economic, and environmental benefits and the reduction of costs and risks; and energy security and resiliency. It is the intent of the legislature that in achieving this policy for Washington, **there should not be an increase in environmental health impacts to highly impacted communities.**<sup>1</sup> [emphasis added]*

The original EIS does not quantify the cooling potential of the mature trees in the transmission corridor or the health benefits of cooler temperatures. The EIS also does not appear to recognize the diversity and income level of these impacted neighborhoods. We ask that these omissions be corrected in the SEIS.

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<sup>1</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=19.405.010>

## 2. EVOLVING ENERGY DEMAND

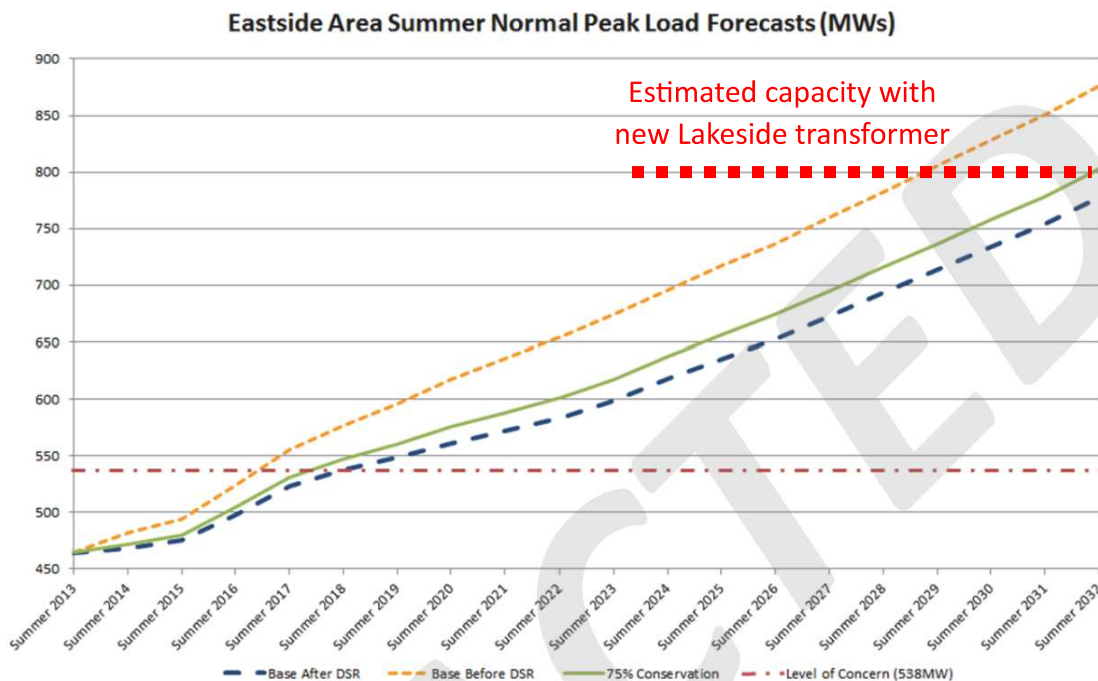
Bellevue has strict decision criteria for siting electrical facilities in the city, as described in Bellevue’s Land Use Code section 20.20.255.E, parts 3 and 4:

- 3) *The applicant shall demonstrate that an operational need exists that requires the location or expansion at the proposed site;*
- 4) *The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole, as certified by the applicant’s licensed engineer;<sup>2</sup>*

In 2015, PSE published the Supplemental Eastside Needs Assessment Report to meet these requirements. However, eight years have passed since the 2015 update, and conditions have dramatically changed. In 2020, an independent analyst found no “clear need” for Energize Eastside to serve a winter scenario:

*Our review of historical winter peak loads and the capacity thresholds in King County shows PSE’s winter peak load actually has been declining over the past several years. While we found that PSE’s own winter load forecast is above the capacity threshold, **we cannot conclude based on the data we analyzed whether there is a clear need for transmission capacity expansion for serving winter peak loads.**<sup>3</sup> [emphasis added]*

Regarding summer need, PSE’s 2015 report includes the following forecast (red line added):



<sup>2</sup> <https://bellevue.municipal.codes/LUC/20.20.255>

<sup>3</sup>

<https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Synapse%20MaxETA%20Energize%20Eastside%20Report-Newcastle%207.22.2020.pdf>, p. 3

The chart shows summer peak loads exceeding the capacity of the Eastside grid during an N-1-1 failure by the summer of 2018. Has Eastside demand grown as vigorously as PSE expected? Did the pandemic and its societal after-effects alter the trend? Is strong adoption of rooftop solar making any difference? These questions are not considered in the original EIS and should be explored in the SEIS.

There is an even more important factor to consider. The Eastside is now served by a fifth 230kV transformer, located in Bellevue. The new transformer, powered by the South Segment of Energize Eastside, increases the emergency capacity of PSE's system to approximately 800 MW, shown on the chart as a thick dotted red line. If this figure is accurate (it should be validated by an updated power flow study), the grid will have sufficient capacity to provide reliable electricity until at least 2032.

To fulfill the requirements of Bellevue's Land Use Code, a clear statement of need is required. A full power flow study must be performed by PSE or an independent analyst to understand the behavior of the grid with the new transformer during an N-1-1 emergency outage.

### 3. CLIMATE CHANGE IMPLICATIONS

In PSE's 2023 Electric Progress Report, PSE improved the accuracy of its system-wide demand forecast by accounting for the impacts of climate change:

*The 2023 Electric Report incorporates climate change in the base energy and peak demand forecast for the first time. We heard from interested parties that it is vital to incorporate climate change because **it affects future demand, and we agree.** ... Before this report, PSE used temperatures from the previous 30 years to model the expected normal temperature for the future. This approach was a common utility practice but did not recognize predicted climate change impacts on temperatures. ... **Including climate change in this report for the first time is a significant milestone, but we recognize this methodology needs to be refined and will evolve in future planning efforts.**<sup>4</sup> [emphasis added]*

Would the Energize Eastside project be different if PSE had properly accounted for warmer winters and focused instead on summer need? The EIS provides no insights and dismisses solar panels and energy storage due to winter concerns:

*Typically, winter peak system loading occurs in the morning and evening, when solar is less effective because of shorter daylight hours. **Solar could help reduce summer peak loads** but because additional capacity would continue to be needed for winter, the use of solar generation to address the transmission capacity deficiency would need to be matched by winter generation capacity and therefore would be redundant.*

***Summer requirements were not evaluated** because the limitations identified during the winter study indicated that energy storage would not be a feasible stand-alone alternative.<sup>5</sup> [emphasis added]*

The SEIS should determine if less expensive and less damaging alternatives could serve summer needs.

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<sup>4</sup> [https://www.pse.com/-/media/PDFs/IRP/2023/electric/chapters/00\\_EPR23\\_ChapterBook\\_Final.pdf?modified=20230331180618](https://www.pse.com/-/media/PDFs/IRP/2023/electric/chapters/00_EPR23_ChapterBook_Final.pdf?modified=20230331180618), p. 1.4

<sup>5</sup> Phase 1 Draft EIS, p. 2-40

#### 4. IMPACT OF THE INFLATION REDUCTION ACT

Federal legislation has changed the cost calculation for clean energy technologies like solar panels and batteries. The 2022 Inflation Reduction Act (IRA) provides hefty Investment Tax Credits and Production Tax Credits that can defray the costs of solar and battery projects.

In 2018, PSE commissioned a study that dismissed the feasibility of batteries to serve Eastside needs. Besides not accounting for tax subsidies, other shortcomings should be corrected in the SEIS:

- a) The study assumed a battery solution would need to address both summer and winter emergency scenarios. Now a potentially smaller solution could focus on summer need.
- b) The study evaluated solutions comprised only of batteries. A solution that combines batteries, solar panels, and demand response (like Time Varying Rates) is likely to be less expensive than a pure battery solution.
- c) Market costs for solar panels and batteries have declined since the 2018 study. Batteries using different materials (like iron-air batteries, saltwater batteries, and flow batteries) have become more feasible during the past four years.
- d) CETA motivates PSE to invest in clean energy technologies to deliver carbon-free electricity by 2045. Investments in solar panels and batteries can serve a dual purpose, providing cleaner electricity and improving reliability.
- e) Solar panels and batteries can be acquired incrementally each year, with capacity sized to meet just the needs expected in the next few years. In contrast, a transmission line is an “all or nothing” project, with a large amount of capacity added in one expensive chunk. The former solution can adapt to changing trends and conditions; the transmission solution cannot.

The SEIS should fully account for the lower cost and environmental justice advantages of modern energy technologies compared to a poles-and-wires solution.

#### 5. ELECTRIFICATION OF THE EASTSIDE

In 2021, Washington passed the Climate Commitment Act which creates a market-based “cap and invest” system to reduce emissions from fossil fuels 95% by 2050. Some people may wonder if electrification of transportation, space and water heating, and cooking might spike demand for electricity. However, PSE has never claimed electrification is a justification for the project.

In fact, PSE is resisting the legislature’s intent. In PSE’s 2023 Gas Integrated Resource Plan, PSE forecasts only modest reductions in emissions from natural gas, relying on green hydrogen or biodiesel fuel to displace small portions of PSE’s natural gas deliveries. This plan was soundly rejected by all the environmental organizations, including Sierra Club, Climate Solutions, NW Energy Coalition, Citizens Climate Lobby, and Washington Clean Energy Coalition.<sup>6</sup>

Unless PSE embraces electrification to significantly reduce emissions from natural gas, the SEIS should not assume that Eastside demand for electricity will dramatically increase in coming decades.

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<sup>6</sup> All the organizations called upon PSE’s state regulator, the Utilities and Transportation Commission, to reject PSE’s plan. As of the date of this document, no final decision has been announced by the Commission.

## 6. EMERGING TECHNOLOGIES

Many new technologies are becoming feasible that could economically serve Eastside peak demand. Here are just a few developments that should be considered in the SEIS:

- a) *Time Varying Rates*. PSE will soon start a pilot program where customers are charged different rates for electricity consumed at different times of day. For example, many electric vehicles may be set to charge after midnight, when electricity will cost half or even a third of what it will cost during peak hours. Customers will gain more control over their monthly electric bills, and the need for expensive infrastructure to serve peak demand will be reduced.
- b) *Virtual Power Plant*. PSE's new Virtual Power Plant platform will be able to withdraw electricity from participating residential or commercial batteries during peak hours. The battery owners will receive compensation to help defray the cost of the batteries. Assuming owners buy the batteries with their own funds, the cost of infrastructure would be reduced, keeping the cost of electricity reasonable for everyone.
- c) *Vehicle To Home/Grid*. PSE's Virtual Power Plant could also get electricity from idle electric vehicles plugged into bi-directional chargers. The total capacity of the batteries in electric cars, trucks, and buses would dwarf the size of any conventional big battery. Owners would be compensated to help offset the cost of their monthly car payments.

This is not an exhaustive list of the technologies that could play a significant role in our electric grid during the next decade or two. Unless a significant need is documented in the next couple of years, it would be wise to monitor technologies that could help make the Eastside grid more reliable, affordable, equitable, and environmentally friendly.

In conclusion, we believe that these are crucial areas of study to ensure a comprehensive, equitable, and forward-looking Supplemental Environmental Impact Statement.

# SIERRA CLUB COMMENTS ON PUGET SOUND ENERGY ENERGIZE EASTSIDE TRANSMISSION UPGRADE PROJECT

The Sierra Club raises five critical reservations concerning PSE's plans to develop the North Segment of its proposed Energize Eastside transmission upgrade project. These concerns include:

1. The obsolescence and potential inaccuracy of need assessment studies that justify the project.
2. A lack of comprehensive impact assessments on vulnerable communities in the Environmental Impact Statement (EIS).
3. Probable intensification of urban "heat islands" due to potential deforestation.
4. Failure to consider the impact of evolving state and national legislation.
5. Questions regarding the real purpose of the North Segment.

These reservations are documented in further detail in the following sections.

## 1. RELIANCE ON OUTDATED STUDIES

Federal transmission planning guidelines suggest that studies used to rationalize transmission projects be updated every five years, unless no significant changes have occurred within that period. PSE's latest publicly available studies date back to 2015, notably failing to consider climate change impacts – a factor only incorporated into PSE's modeling in 2022.

PSE's recently published 2023 Electric Progress Report shows that climate change will significantly alter peak demand for electricity in coming years. Changing demand trends may diminish the urgency or even the need for the project in the foreseeable future.<sup>1</sup> It is vital that PSE refreshes its forecast to incorporate climate change effects, ensuring the project remains cost-effective.

Furthermore, the project's alternative solutions, including battery storage, were deemed expensive and unscalable reports commissioned by PSE in 2015 and 2018. However, advancements in the past five years necessitate reconsideration of these assumptions, including the changes in peak load requirements, the opportunities offered by a combination of battery storage, local solar, and demand response technologies, the push towards clean energy, and the potential redundancy of the North Segment.

Considering these changes, an updated study is essential to reassure stakeholders of the project's viability and cost-effectiveness.

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<sup>1</sup> A study by an independent analyst engaged by the City of Newcastle in 2020 dismissed the need for Energize Eastside to serve any winter emergency scenario.



## 2. IMPACT ON VULNERABLE COMMUNITIES

The North Segment's proposed path disproportionately burdens vulnerable populations residing in Central Bellevue. Figure 1 shows five Census Block Groups along the North Segment route that are more diverse, younger, and generally closer to the poverty line than the rest of the city.<sup>2</sup>

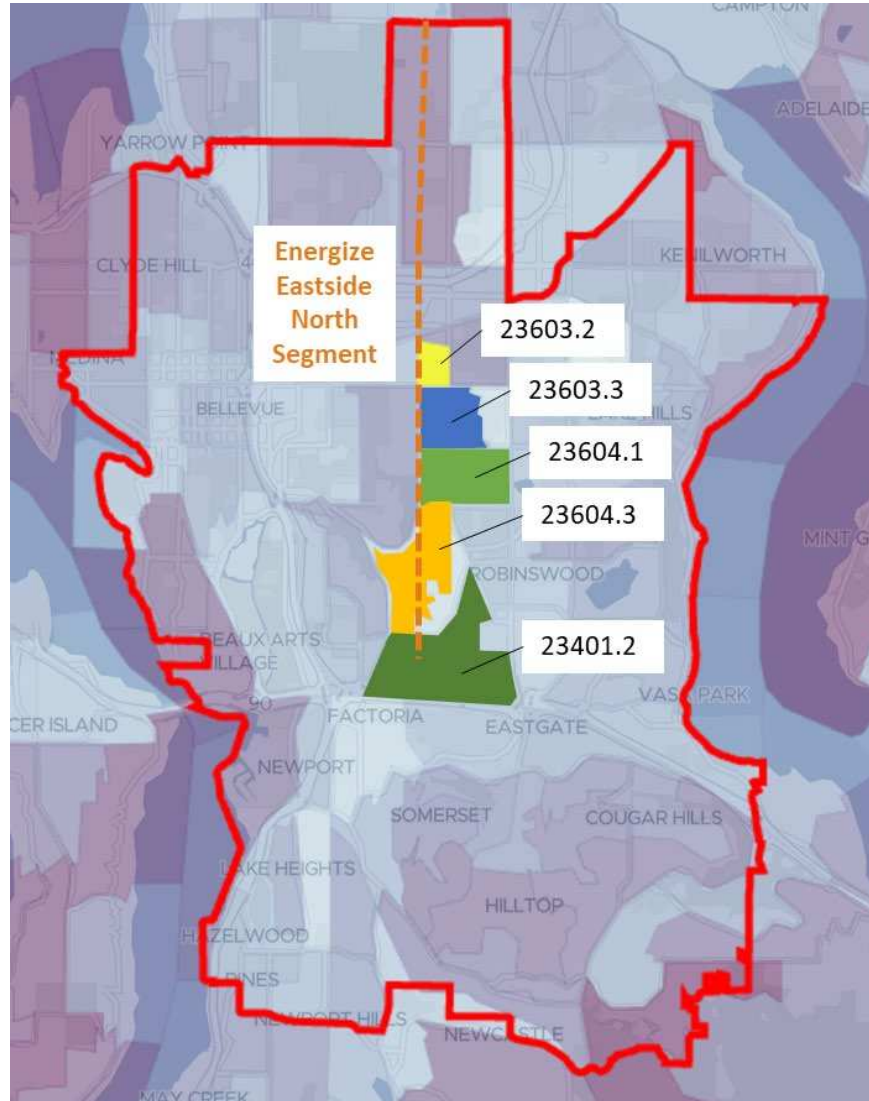


Figure 1 – Census Block Groups along the North Segment in Bellevue

Of the 86 Census Block Groups in Bellevue, Block 53033.23603.2 (shown in bright yellow in Figure 1) has the highest percentage of residents living below the poverty line (20%). This Block also contains the highest percentage of minorities (89%) of any Block in Bellevue. The residents are mostly Asian and Hispanic.

Residents of Block 53033.23604.3 (shown in orange in Figure 1) earn less than half the median income of the city.

<sup>2</sup> <https://www.city-data.com/income/income-Bellevue-Washington.html#>

The North Segment project may contribute to historic patterns of energy infrastructure siting, burdening disadvantaged populations, and contradicting the principles of Washington's Clean Energy Transformation Act. The construction phase, including noise, pollution, and mobility restrictions, the destruction of mature trees, potential property value depreciation, and increased energy costs will all disproportionately impact these vulnerable communities.

Investments in more modest and direct solutions, such as solar panels and batteries, can alleviate power outages on any day of the year, whether the disruptions are caused by generation, transmission, or distribution outages. Solutions that offer more services to these communities at less cost align with the spirit of recent legislation.

### 3. TREE REMOVAL AND HEAT ISLANDS

Recent heat waves and a growing understanding of climate change have reinforced the importance of urban tree cover, especially to mitigate high temperatures in heat islands. PSE's proposal to remove up to 70% of the trees in the Central Bellevue transmission corridor will likely exacerbate this issue, posing risks to communities living nearby. Figure 2 shows the previously mentioned Census Block Groups in relation to two heat islands (shown in red), as identified by a King County heat survey in 2021.<sup>3</sup> These neighborhoods are already up to 10 degrees warmer than more affluent neighborhoods in Bellevue, posing a significant risk to the health and comfort of these residents.

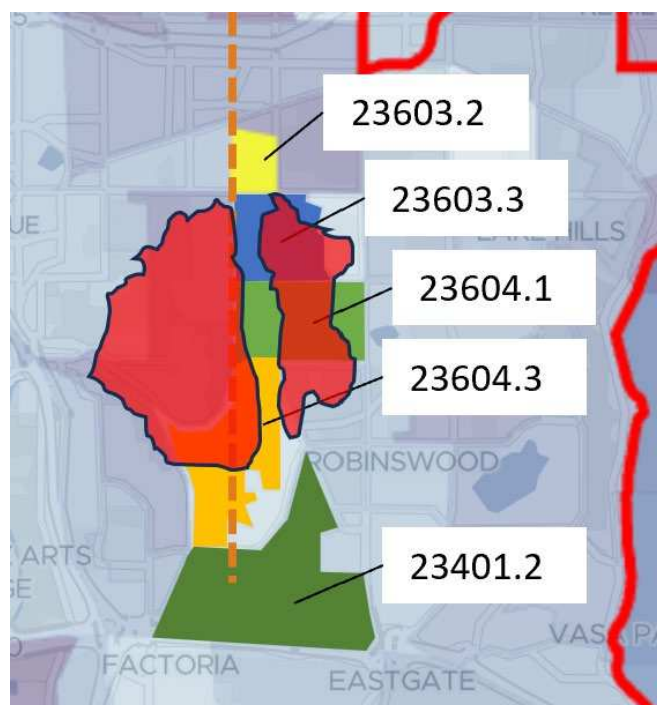


Figure 2 – High temperature on summer afternoon

Although PSE promises to plant replacement trees, the shorter species being proposed cannot provide an equivalent level of cooling. Again, alternatives that do not necessitate destruction of valuable urban trees would be better for the environment and vulnerable communities.

<sup>3</sup> <https://kingcounty.gov/elected/executive/constantine/news/release/2021/June/23-heat-mapping-results.aspx>

#### 4. CHANGING POLICY AND LEGISLATION

In the time since the Final EIS for Energize Eastside was completed, there have been considerable shifts in state and national legislation addressing the climate crisis. Landmark bills such as Washington's Clean Energy Transformation Act (CETA) and the Climate Commitment Act (CCA), along with the federal Inflation Reduction Act (IRA), are rewriting PSE's long-term energy plans. The impacts of these bills have not been incorporated into PSE's plans for Energize Eastside or the EIS.

CETA compels the company to invest in rooftop solar, energy storage, and demand response, all of which diminish the need for transmission lines designed solely to meet peak demand. (Transmission lines that connect cities to distant sources of renewable energy are needed, but that was never the purpose of Energize Eastside.)

The IRA provides federal funding for clean energy projects, shifting feasibility of solar and storage. The magnitude of these changes is shown by McKinsey in Figure 3.<sup>4</sup>

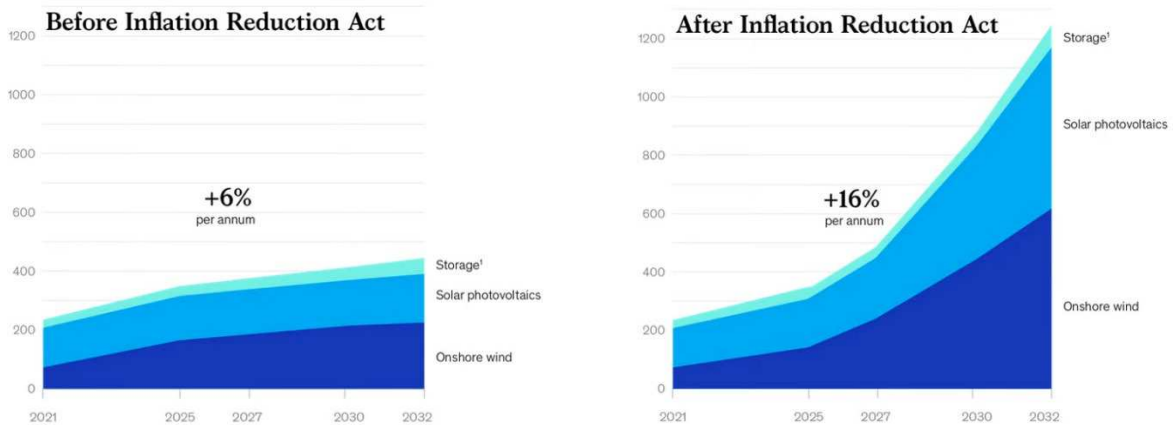


Figure 3 – Inflation Reduction Act incentivizes growth of alternative solutions

It is notable that the IRA will not provide any subsidies for the North Segment, making a transmission upgrade relatively more expensive than alternative solutions.

#### 5. PURPOSE OF ENERGIZE EASTSIDE

Questions surround the real purpose of the North Segment of Energize Eastside. Now that the South Segment is powering a new 230 kV substation, it is unclear whether the North Segment will enhance reliability for Eastside customers. Furthermore, the North Segment's adverse economic and environmental impacts, and the lack of thorough documentation justifying its need, provide the city with substantial reasons to insist that PSE transparently demonstrates the North Segment will prevent power outages for Bellevue customers in any scenario allowed by federal planning standards.

In conclusion, we advocate for stringent due diligence before proceeding with this project, considering evolving climate policy, technological developments, and potential impacts on vulnerable communities. PSE must fully address the issues outlined herein, ensuring the project aligns with both Bellevue's land use code and the broader mandate of a sustainable and equitable energy future.

<sup>4</sup> <https://www.mckinsey.com/featured-insights/sustainable-inclusive-growth/chart-of-the-day/talent-crunch>

## Pittman, Reilly

---

**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Friday, July 28, 2023 10:30 AM  
**To:** Pittman, Reilly; Stead, Elizabeth  
**Cc:** Norm Hansen; Robinson, Lynne; Nieuwenhuis, Jared; Barksdale, Jeremy; Lee, Conrad; Robertson, Jennifer S.; Stokes, John; Zahn, Janice; bradley.strauch@pse.com; Donovan, Jackie  
**Subject:** Re: PSE permit application for Energize Eastside ... further comments by Richard Lauckhart  
**Attachments:** Demonstration of the need to operate all PSE gas fired generation in a heavy winter load situation.pdf

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Mr. Pittman and Ms. Stead-

These are further comments on the PSE Application for a permit for Energize Eastside.

The PSE studies done that allegedly demonstrate a need for Energize Eastside are flawed in several ways. This comment addresses the PSE assumption that 1,500 MW of PSE's owned/controlled gas fired generation was turned off in the PSE/Quanta studies during a heavy winter peak. That makes no sense.

I am attaching a graphic from the PSE Integrated Resource Plan filed with the WUTC. See attachment.

This graphic demonstrates that PSE could not meet its power supply needs in a heavy load winter situation if it does not have all of its 1,500 MW of gas fired generation operating. Yet in its load flow studies for Energize Eastside, PSE shuts down all of these gas fired generators. That makes no sense.

The MaxETA/Synapse report dated June 2020 for the City of Newcastle states as follows: *"While we found that PSE's own winter load forecast is above the load threshold for concern in King County, we cannot conclude based on the data we analyzed whether there is any clear need created by the winter peak load for transmission capacity expansion in the future. PSE's past winter peak load forecasts have been over-predicting winter peak loads."*

That is fully consistent with the Lauckhart/Schiffman report.

Public comments to the City of Bellevue on this matter have pointed out that the PSE studies showing the need for Energize Eastside are 10 years old and they need to be redone with more current data.

**The City of Bellevue should demand that PSE re-run its load flow studies with all 1,500 MW of gas fired generation in NW Washington operating.** Alternatively, the City of Bellevue should deny the application and let EFSEC rerun the PSE studies. EFSEC will necessarily have updated information and will recognize that PSE needs to operate all of its 1,500 MW of NW Washington gas fired generation just to meet its load. Which means the EFSEC updated load flow studies for Energize Eastside will necessarily need to be running all 1,500 MW of NW Washington gas fired generation during the Heavy Winter load conditions. That alone will negate the need for Energize Eastside.

**Please add these comments to your records on this matter.**

Richard Lauckhart  
Consultant for CENSE and past VP of Power Planning at Puget  
44475 Clubhouse Drive  
El Macero, CA 95618  
lauckjr@hotmail.com  
916-769-6704

---

**From:** Richard Lauckhart <lauckjr@hotmail.com>

**Sent:** Tuesday, July 18, 2023 7:38 PM

**To:** RPittman@bellevuewa.gov <RPittman@bellevuewa.gov>; estead@bellevuewa.gov <estead@bellevuewa.gov>

**Cc:** Norm Hansen <hansennp@aol.com>; lrobinson@bellevuewa.gov <lrobinson@bellevuewa.gov>;

jnieuwenhuis@bellevuewa.gov <jnieuwenhuis@bellevuewa.gov>; jbarksdale@bellevuewa.gov

<jbarksdale@bellevuewa.gov>; cleee@bellevuewa.gov <cleee@bellevuewa.gov>; j.robertson@bellevuewa.gov

<j.robertson@bellevuewa.gov>; jstokes@bellevuewa.gov <jstokes@bellevuewa.gov>; jzahn@bellevuewa.gov

<jzahn@bellevuewa.gov>; bradley.strauch@pse.com <bradley.strauch@pse.com>; jdonovan@bellevuewa.gov

<jdonovan@bellevuewa.gov>

**Subject:** PSE permit application for Energize Eastside ... comments by Richard Lauckhart

Mr. Pittman and Ms. Stead-

I spoke and otherwise participated via internet in the Public Meeting tonight regarding the PSE permit application for Energize Eastside.

I heard nearly every public commenter pointing out that the PSE studies to justify the need for Energize Eastside are 10 years old and very much in need of restudy. Commenters believe that if the studies are redone, then it will be found that Energize Eastside is not needed.

The comments I sent to Mr. Pittman and others below include a PDF Document explaining that the studies need to be redone to reflect much new information. My suggestion to date has been for the City to deny the permit so the matter of need can be studied by EFSEC. Clearly, EFSEC would use updated information.

If the City of Bellevue does not want to turn this over to EFSEC, then the City of Bellevue needs to somehow have the studies redone by some independent party who will take into account the many matters that others and I have already provided on what needs to be fixed in the studies.

It also would be very helpful if the City of Bellevue posted all the comments on this matter on a city website. That is what was done in the South Bellevue proceeding and in Newcastle. Why not do that here? Using the Public Record Act request process is really not an acceptable process.

Please add these comments to your records on this matter.

Richard Lauckhart  
Consultant for CENSE and past VP of Power Planning at Puget  
44475 Clubhouse Drive  
El Macero, CA 95618  
lauckjr@hotmail.com  
916-769-6704

---

**From:** Richard Lauckhart  
**Sent:** Wednesday, July 5, 2023 1:29 PM  
**To:** RPittman@bellevuewa.gov <RPittman@bellevuewa.gov>  
**Cc:** Norm Hansen <hansennp@aol.com>; lrobinson@bellevuewa.gov <lrobinson@bellevuewa.gov>; jnieuwenhuis@bellevuewa.gov <jnieuwenhuis@bellevuewa.gov>; jbarksdale@bellevuewa.gov <jbarksdale@bellevuewa.gov>; clee@bellevuewa.gov <clee@bellevuewa.gov>; j.robertson@bellevuewa.gov <j.robertson@bellevuewa.gov>; jstokes@bellevuewa.gov <jstokes@bellevuewa.gov>; jzahn@bellevuewa.gov <jzahn@bellevuewa.gov>; bradley.strauch@pse.com <bradley.strauch@pse.com>; jdonovan@bellevuewa.gov <jdonovan@bellevuewa.gov>  
**Subject:** Preliminary comments on PSE permit application for Energize Eastside made on behalf of CENSE by Richard Lauckhart

Dear Mr. Pittman-

Attached are preliminary comments I am making on behalf of CENSE on PSE's application for a permit for Energize Eastside. The File Numbers are: 21-104991 LB and 21-104989 LO

Richard Lauckhart  
Consultant for CENSE and past VP of Puget  
44475 Clubhouse Drive  
El Macero, CA 95618  
916-769-6704

## List of Puget Sound Area resources in Quanta load flow studies:

Quanta shut down Sumas, Ferndale, Whitehorn, Fredonia, Freddy 1, and Fredonia in their very high Winter load scenario. By contrast, WECC ran these six PSE resources in their very high Winter load scenario.

Table 4-4: List of Puget Sound Area Generators Adjusted in the 2013 Eastside Needs Assessment

Generation Plant	Winter MW Rating	Expected MW Output during Winter Peak for Low-Generation Sensitivity Case	Type	Owner	Transmission Delivery Area
Enserch	184.8	125	Natural Gas, Combined Cycle	PSE	Whatcom County
Sumas	139.8	0	Natural Gas, Combined Cycle	PSE	Whatcom County
Ferndale	282.1	0	Natural Gas, Combined Cycle	PSE	Whatcom County
Whitehorn	162.2	0	Natural Gas, Simple Cycle	PSE	Whatcom County
Fredonia	341	0	Natural Gas, Simple Cycle	PSE	Skagit County
Sawmill	31	22	Biomass	Private Owner	Skagit County
Upper Baker	106	80	Hydro Dam	PSE	Skagit County
Lower Baker	78	54	Hydro Dam	PSE	Skagit County
Kono Kulshan	14	0	Hydro Run-of-River	Private Owner	Skagit County
March Point	151.6	134	Natural Gas, Combined Cycle	Shell	Skagit County
Ross	450	295	Hydro Dam	SCL	Snohomish County
Gorge	190.7	157	Hydro Dam	SCL	Snohomish County
Diablo	166	160	Hydro Dam	SCL	Snohomish County
South Tot River	16.8	0	Hydro Run-of-River	SCL	Northwest King County
Snoqualmie	37.8	0	Hydro Run-of-River	PSE	East King County
Twin Falls	24.6	0	Hydro Run-of-River	Private Owner	East King County
Cedar Falls	30	0	Hydro Run-of-River	SCL	East King County
Freddy 1	270	0	Natural Gas, Combined Cycle	Atlantic Power/PSE	Pierce County
Election	20	4	Hydro Run-of-River	PSE	Pierce County
Frederickson	162.2	0	Natural Gas, Simple Cycle	PSE	Pierce County

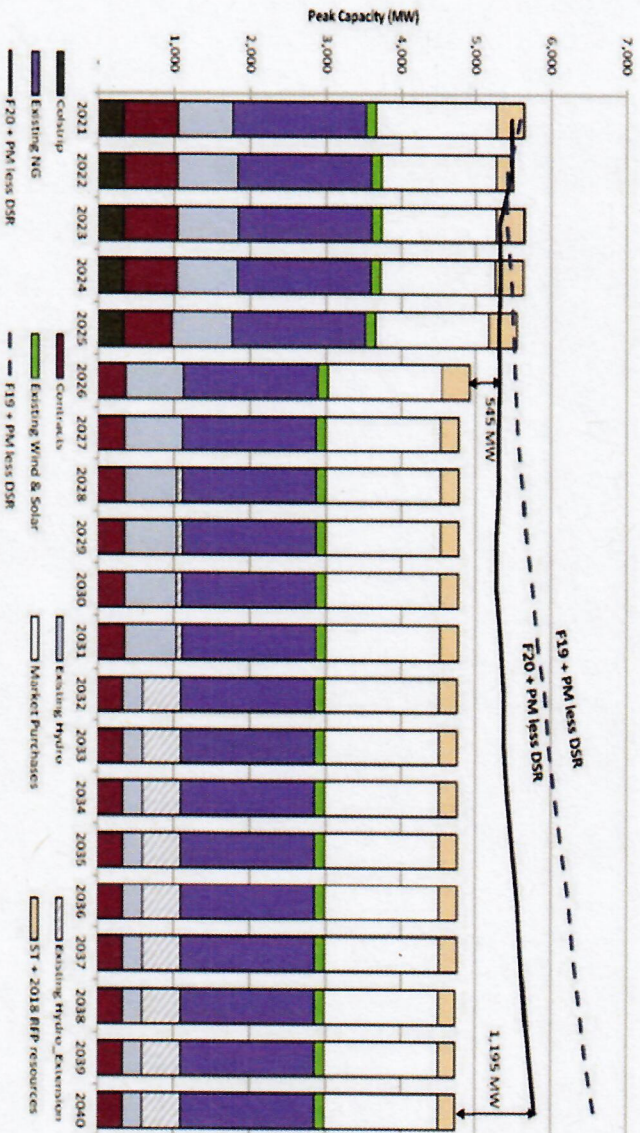
Expected MW output during Winter peak is based off of actual 2011-2012 Winter peak output except for SCL hydro, which is based off of modeled generation levels in WECC winter peak case.

# PSE's latest Supply and Demand balance

Shows 545 MW of new capacity need in Winter by the year 2026.

That is with all PSE gas fired generation running. Removing the 1,600 MW of PSE Gas fired generation like was done by Quanta make the shortfall grow to over 2,100 MW. That is not a legitimate scenario for the future. The gas fired generation needs to run during the winter peak and can be available for use in the Summer is needed.

**Figure 2. Capacity Need from the F2020 Normal Peak Load Forecast**





## Observations from the PSE Supply and Demand table

- PSE is short on power today. Their plan is to rely on the uncertain and risky spot market for power. Who knows if that power will be available, and if so, what it will cost. Relying on such a short term market is what drove Pacific Gas & Electric into bankruptcy several years ago.
- But the problem in the PSE/Quanta modeling is that they remove a large part of the PSE natural gas fired generation that is included on this chart.
- That not only makes no sense, but it causes “voltage collapse” in the Puget Sound region.

The location of these 6 PSE gas fired generators and their operation is critical to providing reliable power to PSE customers and all customers in the Puget Sound Region including Seattle City Light customers.

Shutting down these 6 PSE gas fired generators in a period of high demand for power in the Puget Sound Area would not be allowed by the reliability coordinator RC West.

## Puget Sound Area gas fired generation

- The location of these 6 PSE gas fired generators and their operation is critical to providing reliable power to PSE customers (*and all customers in the Puget Sound Region including Seattle City Light customers*).
- Shutting down these 6 PSD gas fired generators in a period of high demand for power in the Puget Sound Area would not be allowed by the reliability coordinator RC West.

## Pittman, Reilly

---

**From:** KCWTD Other Agency Planning <KCWTD\_otheragencyplanning@kingcounty.gov>  
**Sent:** Wednesday, July 19, 2023 11:30 AM  
**To:** Pittman, Reilly  
**Cc:** KCWTD Other Agency Planning; LPA TEAM; Hartman, Rachael; Fischer, Katherine  
**Subject:** KCWTD Question re Energize Eastside project  
**Attachments:** EnergizeEastsidePhase2.pdf

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**Zanna Satterwhite** (*she/her*)  
Water Quality Planner/Project Manager  
King County Wastewater Treatment Division (WTD)  
Environmental and Community Services Section  
[zsatterwhite@kingcounty.gov](mailto:zsatterwhite@kingcounty.gov)  
(206) 263-1998

---

**From:** KCWTD Other Agency Planning <KCWTD\_otheragencyplanning@kingcounty.gov>  
**Sent:** Friday, July 14, 2023 8:56 AM  
**To:** Fischer, Katherine <Katherine.Fischer@kingcounty.gov>  
**Cc:** KCWTD Other Agency Planning <KCWTD\_otheragencyplanning@kingcounty.gov>; Satterwhite, Zanna <zsatterwhite@kingcounty.gov>  
**Subject:** RE: Bellevue Energize Eastside - submit another comment letter?

Hello Reilly,

PSE's Energize Eastside project overlaps with many of King County Wastewater Treatment Division's subsurface conveyance lines. On June 20, 2017, King County DNRP submitted a comment letter in response to PSE's Phase 2 Draft EIS for the Energize Eastside project (see attached; doesn't include original enclosures). We saw the recent "re-Notice of Application and Notice of public meeting" for the Energize Eastside Bellevue North Segment. We would like to get some clarification on what, if anything, has actually changed on the project. Is King County WTD still a party of record, or do we need to comment again? Were our original comments considered in the design? If not, we would want to comment.

Thank you,

**Zanna Satterwhite** (*she/her*)  
Environmental Planner  
King County Wastewater Treatment Division (WTD)  
(206) 263-1998

King County Other Agency Planning (OAP) / Local Public Agency Program  
<https://kingcounty.gov/services/environment/wastewater/local-public-agency.aspx>

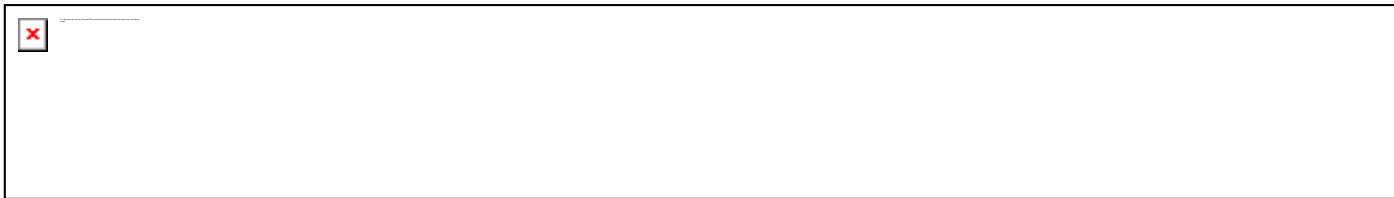
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**From:** City of Bellevue <[bellevuewa@public.govdelivery.com](mailto:bellevuewa@public.govdelivery.com)>  
**Sent:** Thursday, June 29, 2023 3:51 PM

To: KCWTD Other Agency Planning <[KCWTD\\_otheragencyplanning@kingcounty.gov](mailto:KCWTD_otheragencyplanning@kingcounty.gov)>

Subject: City of Bellevue Weekly Permit Bulletin 6-29-23

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## **King County**

**Department of  
Natural Resources and Parks**

Director's Office

King Street Center

201 S Jackson St, Suite 700

Seattle, WA 98104-3855

June 20, 2017

Heidi Bedwell  
Environmental Planning Manager  
City of Bellevue  
Development Services Department  
P.O. Box 90012  
Bellevue, WA 98009-9012

Dear Ms. Bedwell:

I am writing to provide comments from the King County Department of Natural Resources and Parks (DNRP) in response to Puget Sound Energy's (PSE) Phase 2 Draft Environmental Impact Statement (DEIS) for its Energize Eastside Project. The alternatives and related potential infrastructure development clearly encompass multiple places where existing and planned KC DNRP facilities could be impacted, and we appreciate the opportunity to provide information about these impacts to inform further consideration of these alternatives.

These comments pertain most directly to facilities, projects, and programs owned, operated, and/or implemented by, respectively, the Wastewater Treatment Division (WTD) and the Parks and Recreation Division (Parks) within DNRP. WTD owns and operates numerous and far-reaching facilities throughout western King County, including significant public facilities within and/or across several sections of the alternatives under consideration. The effective implementation, operation, and maintenance of these critical wastewater facilities are and will continue to be important points of consideration for PSE as the Energize Eastside project moves forward.

Parks owns property interests in the Eastside Rail Corridor (ERC) supporting the development of a much-anticipated regional trail within the ERC. King County has established, pursuant to the Reciprocal Coordination and Cooperation Covenant Agreement with PSE, a Planned Trail Area for the regional trail alignment throughout our ERC ownership area. King County also has an approved ERC Trail Master Plan that establishes a preferred trail alignment and has completed a planning level EIS related to the alignment proposal within the Eastside Rail Corridor. The two "bypass" routes under consideration call for the use of a segment of the ERC, over which King County holds property interests supporting trail and utility uses, for facilities that could be part of the implemented Energize Eastside project. While the ERC

vision, developed by King County and the other owners of the ERC, supports the use of the ERC for transit, trails, and utilities, installation and operation of such facilities in this segment would affect the planning, design, implementation, and operation of a regional trail facility.

Staff from WTD and Parks have prepared more detailed comments on the substance of the DEIS. They are provided below. Please note that this letter includes an enclosed figure depicting specific locations where the alternatives under consideration intersect with existing or planned WTD facilities, and a figure that depicts the planned alignment of the regional trail in the bypass segments.

Detailed comments from WTD:

The alternatives intersect with WTD facilities in the following places, listed from north to south:

- All action alternatives would cross the Lake Hills Interceptor in the Bellevue Central Segment
- The Bellevue Central Bypass options 1 and 2 would:
  - Cross and parallel the Lake Hills Interceptor
  - Parallel the Eastside Interceptor (ESI) sections 11 and 12
  - Cross the Bellevue Force Mains
  - Cross and parallel the Factoria Trunk
- The Oak 1 and Oak 2 alternatives in the Bellevue South Segment would cross and then parallel the Factoria Trunk
- All alternatives would cross the Coal Creek Trunk in the Bellevue South Segment
- The Oak 1, Oak 2, and Willow 2 alternatives in the Bellevue South Segment would also closely parallel the Coal Creek Trunk
- All alternatives would cross the Cedar River Interceptor in the Renton Segment

The approximate locations of these crossings and parallels are shown on the attached map. In addition, WTD may have permanent easements or similar property rights for these conveyance facilities.

WTD also has a capital project currently in design that parallels the Bellevue South Willow 1 and 2 alignments. This project, the Coal Creek Siphon and Trunk Parallel is currently in alternatives analysis with predesign scheduled to begin in the third quarter of 2017 and construction expected to go from late 2021 through 2024.

WTD is requesting that PSE and the City of Bellevue consider the potential impacts of the proposed project on these and other wastewater facilities when identifying and analyzing the impacts of project alternatives. WTD would need to be assured the right to maintain and repair our facilities, and, in the event that a sewer line must be relocated, new permanent easements will need to be provided. Impact analysis for the DEIS should be more specific regarding potential impacts to wastewater facilities.

WTD is also requesting that PSE and the City of Bellevue submit design drawings and other project information for review as design development continues so that King County staff can more directly assess the project's impacts.

WTD has Record Drawings available for all of our facilities in the Energize Eastside route options. Requests for WTD Record Drawings, further design information of the Coal Creek Siphon and Trunk Parallel, or further PSE Energize Eastside design level development information should be sent to:

Mark Lampard, P.E.,  
Local Public Agency Coordinator  
King County Wastewater Treatment Division  
201 South Jackson Street, KSC-NR-0503  
Seattle, WA 98104-3855  
(206) 477-5414  
[mark.lampard@kingcounty.gov](mailto:mark.lampard@kingcounty.gov)

Detailed comments from Parks:

The Energize Eastside Bypass Option 1 and 2 within the Bellevue Central Segment intersect with the ERC between approximately the Lake Hills Connector and NE 1<sup>st</sup> Street. Depending on the pole alignment, there could be impacts to the planned alignment of the trail and related structures and features inherent in the fully constructed profile such as retaining walls, footings, drainage, soft surface shoulders, fencing, lighting, connector pathways, landscaping and other trail furnishings.

The full profile width for the developed trail will typically be between 20-24 feet at the surface. The ERC Master Plan and EIS established a trail planning envelope through the section indicated for Bypass Options 1 and 2 that is 30 feet wide, predominantly centered on the existing railbed centerline. The 30 foot width for planning allows necessary flexibility for the exact lateral alignment of the trail to be determined during the design phase based on physical constraints or the need to minimize impacts or costs. Subsurface improvements such as drainage, other utilities and structural footings may extend beyond the width of the surface profile.

The ERC right-of-way width is constrained to approximately 75 feet at the southern portion of PSE's identified bypass route near the Lake Hills Connector. The ERC widens to 100 feet of available right-of-way north of that point, however the corridor is on steeply sloping and heavily vegetated topography through the entire section with significant underground utilities on the outer edges such as WTD's Eastside Interceptor, fiber optic and other utilities. These and other physical structures in the corridor including WTD's Medina Force Main Odor Control facility on the north side of SE 1<sup>st</sup> Street contributed to the selection of the preferred trail alignment to avoid these features and constraints.



Parks would also like to make PSE aware of potential constraints to pole placement where the identified bypass routes continue through the SE 1<sup>st</sup> Street crossing before heading east out of the ERC. Where the planned trail alignment is approaching the crossing of SE 1<sup>st</sup> Street from the south, it must curve out toward the eastern property boundary in order to approach the skewed roadway crossing at a ninety-degree angle. On the north side of the crossing the trail curves toward the western property boundary before coming back into alignment on the centerline. Sheet 64 of the attached Master Plan Volume 2 plan set shows this layout, which would preclude pole placement on the outer edges of the corridor where the trail is aligned for this crossing. Pole placement must also avoid blocking sight lines at this or other roadway crossings.

Parks has initiated the design phase for the Wilburton Segment of the ERC Trail, which includes the area identified for PSE's Bypass Options 1 and 2. The design of the trail in this area will take place between now and early 2019. This area will be included in the first section of the ERC Trail scheduled for construction from mid-2019 through 2020. This highly anticipated first segment of the trail includes opening the portion of the trail across the nearby Wilburton Trestle to the public by the end of 2020. This segment of the trail is expected to host a high volume of trail users for recreation and nonmotorized transportation, with an estimated average peak volume of 3,000-4,000 bicycle trips per day. Parks is considering a policy change that could make trails such as the ERC open 24 hours per day. If PSE were to select the alignment within the ERC as identified in its bypass route options, an operational agreement with Parks would be necessary to stipulate the terms of access, maintenance, protection of trail, and protocols for any operational activities that could impact trail users.

Parks is requesting that PSE and the City of Bellevue consider the potential impacts of the proposed project on the ERC Trail in terms of physical alignment, potential conflicts, aesthetic impacts, operational impacts, and impacts to the natural environment within the ERC when identifying and analyzing the impacts of project alternatives. Parks is also requesting that PSE and the City of Bellevue submit design drawings and other project information for review as design development continues so that King County staff can assess the project's impacts.

Parks has AutoCAD drawings of the planned trail alignment, corridor topography, surveyed property boundaries and centerline, as well as electronic GIS data layers featuring numerous features of the natural and built environment in and around the ERC. These files are available for use by PSE in evaluating the Energize Eastside route options. Parks also completed numerous planning level studies of the corridor including studies of the ecosystems, historic and cultural resources, geologic conditions, roadway crossings, and corridor right-of-way constraints. Requests for these files, design information for the ERC Trail Wilburton Segment, or further PSE Energize Eastside design level development information that impacts the ERC should be sent to:

Heidi Bedwell  
June 20, 2017  
Page 5

Erica Jacobs  
Project Manager, Eastside Rail Corridor Regional Trail  
King County Parks and Recreation Division  
201 South Jackson Street, KSC-NR-0700  
Seattle, WA 98104-3855  
(206) 477-5539  
[erica.jacobs@kingcounty.gov](mailto:erica.jacobs@kingcounty.gov)

Thank you for the opportunity to provide comments regarding this project. Please feel free to contact David St. John, Department of Natural Resources and Parks, Environmental Affairs Officer, at (206) 477-4517 or [david.st.john@kingcounty.gov](mailto:david.st.john@kingcounty.gov), or Mark Lampard and Erica Jacobs as noted above, if you have any questions about the information provided in this letter or related matters.

Sincerely,



Christie True  
Director

Enclosures

cc: Mark Isaacson, Division Director, Wastewater Treatment Division, Department of Natural Resources & Parks (DNRP)  
Kevin Brown, Division Director, Parks and Recreation Division, DNRP

## Pittman, Reilly

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**From:** Chung, Lawrence <lachung@kingcounty.gov>  
**Sent:** Tuesday, July 18, 2023 5:03 PM  
**To:** Pittman, Reilly  
**Cc:** Greene, John  
**Subject:** KC Comment re: Bellevue - Energize Eastside Bellevue North Segment - 21-104991 LB and 21-104989 LO

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Reilly,

King County Metro Transit (Metro) has received the re-notice of application and notice of public meeting for “Project Energize Eastside Bellevue North Segment - 21-104991 LB and 21-104989 LO.” Please see Metro’s comment below and let me know if you have any questions. Thank you.

Comment #1:

Please have PSE reach out to Metro’s System Impact Construction Information Coordinators before blocking any Right of Way that will impact Metro Bus service. Below is a copy of our web page:

[Transit System Impacts - About Metro - King County Metro - King County](#)

Best Regards,

Lawrence Chung  
Environmental Planner II  
Transit Real Estate & Environmental (TREE)  
Metro Transit Department, Capital Division

201 South Jackson St., MS KSC-TR-0431  
Seattle, WA 98104-3856  
(206) 263-5504  
[lachung@kingcounty.gov](mailto:lachung@kingcounty.gov)



## Pittman, Reilly

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Tuesday, July 18, 2023 7:38 PM  
**To:** Pittman, Reilly; Stead, Elizabeth  
**Cc:** Norm Hansen; Robinson, Lynne; Nieuwenhuis, Jared; Barksdale, Jeremy; Lee, Conrad; Robertson, Jennifer S.; Stokes, John; Zahn, Janice; bradley.strauch@pse.com; Donovan, Jackie  
**Subject:** PSE permit application for Energize Eastside ... comments by Richard Lauckhart  
**Attachments:** Lauckhart preliminary comments V4.pdf

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Mr. Pittman and Ms. Stead-

I spoke and otherwise participated via internet in the Public Meeting tonight regarding the PSE permit application for Energize Eastside.

I heard nearly every public commenter pointing out that the PSE studies to justify the need for Energize Eastside are 10 years old and very much in need of restudy. Commenters believe that if the studies are redone, then it will be found that Energize Eastside is not needed.

The comments I sent to Mr. Pittman and others below include a PDF Document explaining that the studies need to be redone to reflect much new information. My suggestion to date has been for the City to deny the permit so the matter of need can be studied by EFSEC. Clearly, EFSEC would use updated information.

If the City of Bellevue does not want to turn this over to EFSEC, then the City of Bellevue needs to somehow have the studies redone by some independent party who will take into account the many matters that others and I have already provided on what needs to be fixed in the studies.

It also would be very helpful if the City of Bellevue posted all the comments on this matter on a city website. That is what was done in the South Bellevue proceeding and in Newcastle. Why not do that here? Using the Public Record Act request process is really not an acceptable process.

Please add these comments to your records on this matter.

Richard Lauckhart  
Consultant for CENSE and past VP of Power Planning at Puget  
44475 Clubhouse Drive  
El Macero, CA 95618  
lauckjr@hotmail.com  
916-769-6704

---

**From:** Richard Lauckhart  
**Sent:** Wednesday, July 5, 2023 1:29 PM  
**To:** RPittman@bellevuewa.gov <RPittman@bellevuewa.gov>

July 5, 2023

**Richard Lauckhart preliminary comments on City of Bellevue "Re-Notice" of Application**

I am a consultant for CENSE and a past VP of Power Planning at Puget

These are my initial comments on the PSE application for a permit to build Energize Eastside in North Bellevue.

There are a very large number of documents that can be made available to support these comments which will be made available in this proceeding as needed.

**Overview:**

PSE has performed load flow studies that they claim demonstrate the need for Energize Eastside [EE]. But those load flow studies have been shown to contain fatal flaws. Bellevue Land use code 20.20.255.d.2.c requires the Applicant (PSE) to (i) Describe whether the electrical utility facility location is a consequence of needs or demands from customers located within the district or area; and (ii) Describe whether the operational needs of the applicant require location of the electrical utility facility in the district or area. **EE is not a consequence of need in North Bellevue and there is no operational need to locate EE in North Bellevue.**

**No Need:**

A proper load flow study shows **no need** for EE anywhere on the Eastside or the PSE Service Territory. The City of Bellevue needs to protect its residents that live in North Bellevue by rejecting this permit application. The City of Bellevue has no expertise in load flow studies and by rejecting this permit application, the matter then gets turned over to the Washington State Energy Facility Site Evaluation Council [EFSEC]. EFSEC uses experts to perform load flow studies to determine the need for new transmission.

**Major Safety Issues:**

There are also major safety issues involved with co-locating EE with the Olympic Pipeline fuel pipeline. While the probability of a major explosion caused by the co-location of EE with the Olympic Pipeline fuel pipeline is small, the ramifications of such an explosion is huge. The City of Bellevue needs to protect its citizens from this risk to life.

## The Fatal Flaws:

PSE refused to provide the input data from their 2013 and 2015 studies until September 26, 2022 (9 years after the studies were conducted in secret). I found that the PSE/Quanta studies done in 2013 and 2015 contained a **shocking manipulation of the input data to the loaf flow studies**. **Attached below** is the email I sent to many PSE individuals on September 27, 2022 pointing out the problems and asking them to explain if they think my findings were wrong. I have received no response from PSE.

## Fixing the fatal flaws:

The Lauckhart/Schiffman load flow study dated February 18, 2016 demonstrates that **if the fatal flaws are corrected, there is no need for Energize Eastside**.

## Federal Energy Regulatory Commission findings:

*FERC has made it clear in FERC Docket No. EL23-23 that FERC has never examined the need for Energize Eastside and never stated that Energize Eastside was needed.*

*The FERC Order in FERC Docket No. EL23-23 makes it clear that CENSE has never had an opportunity to participate in an open and transparent Stakeholder process regarding the need for Energize Eastside.*

*The FERC Order in FERC Docket No. EL23-23 makes it clear that CENSE has never been provided a copy of any PSE Planning Assessment or TPL-001 reports. It is in the Public Interest that these documents are made to CENSE before there is any finding of the need for Energize Eastside.*

## Conclusion:

The Application fails to meet the Bellevue City Requirement for a permit for EE in North Bellevue. The City of Bellevue needs to protect its residents that live in North Bellevue by rejecting this permit application. The matter then gets turned over to the Washington State Energy Facility Site Evaluation Council [EFSEC]. EFSEC uses experts to perform load flow studies to determine the need for new transmission.

## Attachment

Results of Lauckhart autopsy of the PSE/Quanta load flow modeling data.

## Re: Performing my autopsy of your case data files...

Richard Lauckhart <lauckjr@hotmail.com>

Tue 9/27/2022 12:15 PM

To: Ciarabellini, Jeremy - Transmission <Jeremy.Ciarabellini@pse.com>; Imamovic, Stephanie - Transmission <Stephanie.Imamovic@pse.com>; Green, Brandon - Transmission <Brandon.Green@pse.com>; Gard, Sylvia - Transmission <Sylvia.Gard@pse.com>; Ewry, Eleanor - Transmission <Eleanor.Ewry@pse.com>; Nedrud, Jens - Transmission <jens.nedrud@pse.com>

Cc: Norm Hansen <hansenp@aol.com>; Warren Halvorsen <whalvrsn1@frontier.com>; Neil, Chelsey - TRANSMISSION <Chelsey.Neil@pse.com>

Jeremy-

I have done more research on the files you sent. Additional findings are:

1) Your Base Case (Case 1) has overloads in it without any contingencies. That is because Case 1 also has (a) 1500 MW of NW Washington generation turned off in a Heavy winter conditions, (2) 1,500 MW moving to Canada, and (c) the I-5 Corridor Reinforcement Project in service. There are all three fatal flaws. Overloads appear on the existing 115 KV lines in and out of Lakeside. There should be no overloads in a (N-0) case.

2) Your Case 9 then takes out two elements of the grid on N-1-1. These elements appear to be (a) one 230 KV line section from Maple Valley to Klahanie and (b) the 500 KV line from Maple Valley to Echo Lake.

If you disagree with these findings, please explain what I have wrong.

Richard Lauckhart  
916-769-6704



**Cc:** Norm Hansen <hansennp@aol.com>; lrobinson@bellevuewa.gov <lrobinson@bellevuewa.gov>; jnieuwenhuis@bellevuewa.gov <jnieuwenhuis@bellevuewa.gov>; jbarksdale@bellevuewa.gov <jbarksdale@bellevuewa.gov>; clee@bellevuewa.gov <clee@bellevuewa.gov>; j.robertson@bellevuewa.gov <j.robertson@bellevuewa.gov>; jstokes@bellevuewa.gov <jstokes@bellevuewa.gov>; jzahn@bellevuewa.gov <jzahn@bellevuewa.gov>; bradley.strauch@pse.com <bradley.strauch@pse.com>; jdonovan@bellevuewa.gov <jdonovan@bellevuewa.gov>

**Subject:** Preliminary comments on PSE permit application for Energize Eastside made on behalf of CENSE by Richard Lauckhart

Dear Mr. Pittman-

Attached are preliminary comments I am making on behalf of CENSE on PSE's application for a permit for Energize Eastside. The File Numbers are: 21-104991 LB and 21-104989 LO

Richard Lauckhart  
Consultant for CENSE and past VP of Puget  
44475 Clubhouse Drive  
El Macero, CA 95618  
916-769-6704

## Pittman, Reilly

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**From:** Loretta Lopez <ljlopezmsl@gmail.com>  
**Sent:** Monday, July 17, 2023 2:36 PM  
**To:** Stead, Elizabeth  
**Cc:** Pittman, Reilly; Pat McGiffert; Linda Treece; Barbara Hughes; William Barnes; NORMAN HANSEN; Pam Johnston; whalvrsn1@frontier.com  
**Subject:** City/Public Meeting/PSE July 18  
**Attachments:** ~WRD0000.jpg

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Elizabeth,

I couldn't see all of your emails on my phone. Norm said you had responded so I checked my lap top.

Thank you.

Loretta

On Mon, Jul 17, 2023, 1:59 PM Stead, Elizabeth <[estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)> wrote:

Loretta, there was no attachment. All answers were embedded in with your email below as noted in my first communication. My responses are in blue. Thank you, Liz

---

**From:** Loretta Lopez <[ljlopezmsl@gmail.com](mailto:ljlopezmsl@gmail.com)>  
**Sent:** Friday, July 14, 2023 2:42 PM  
**To:** Stead, Elizabeth <[estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)>  
**Cc:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>; Pat McGiffert <[pmcgiffert@aol.com](mailto:pmcgiffert@aol.com)>; Linda Treece <[LTreece@comcast.net](mailto:LTreece@comcast.net)>; Barbara Hughes <[barbara\\_hughes@hotmail.com](mailto:barbara_hughes@hotmail.com)>; William Barnes <[williambarnesconsulting@gmail.com](mailto:williambarnesconsulting@gmail.com)>; NORMAN HANSEN <[hansennp@aol.com](mailto:hansennp@aol.com)>; Pam Johnston <[pamijo@msn.com](mailto:pamijo@msn.com)>; [whalvrsn1@frontier.com](mailto:whalvrsn1@frontier.com)  
**Subject:** City/Public Meeting/PSE July 18

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Elizabeth,

Did you intend to send an attachment with responses? I don't see an attachment.

What is the purpose of the meeting on July 18? The notice does not set forth the purpose of the meeting.

Loretta

Loretta

On Fri, Jul 14, 2023, 10:14 AM Stead, Elizabeth <[estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)> wrote:

Loretta,

Please see responses below, and please note that it is the Department's position that the City has complied with the procedural requirements in chapter 20.35 LUC and LUC 20.20.255 in connection with PSE's permit applications for the North Segment of the Energize Eastside project. Consistent with our standard practice, any further responses and analysis regarding the adequacy of the public meeting or noticing for said meeting will be provided in the Staff Report and in connection with the Department's recommendation to the Hearing Examiner. If, after reviewing the Staff Report, you still have complaints regarding the City's land use process, then I would encourage you to provide your testimony to the Hearing Examiner during the public hearing on PSE's application.

Thank-you,

**Liz Stead, LEED AP** (she/her)

Land Use Director

Development Services Department

City of Bellevue

425.452.2725, [estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)

[How are we doing?](#)

***\*New!\* Visit our [Virtual Permit Center](#) to schedule a one-on-one virtual appointment with review staff for general permitting questions.***

---

**From:** Loretta Lopez <[ljllopezmsl@gmail.com](mailto:ljllopezmsl@gmail.com)>  
**Sent:** Wednesday, July 12, 2023 10:16 AM  
**To:** Stead, Elizabeth <[estead@bellevuewa.gov](mailto:estead@bellevuewa.gov)>  
**Cc:** Pittman, Reilly <[RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)>; Pat McGiffert <[pmcgiffert@aol.com](mailto:pmcgiffert@aol.com)>; Linda Treece <[LJTreece@comcast.net](mailto:LJTreece@comcast.net)>; Barbara Hughes <[barbara\\_hughes@hotmail.com](mailto:barbara_hughes@hotmail.com)>; William Barnes <[williambarnesconsulting@gmail.com](mailto:williambarnesconsulting@gmail.com)>; NORMAN HANSEN <[hansennp@aol.com](mailto:hansennp@aol.com)>; Pam Johnston <[pamjjo@msn.com](mailto:pamjjo@msn.com)>; [whalvrsn1@frontier.com](mailto:whalvrsn1@frontier.com)  
**Subject:** Re: City/Public Meeting/PSE July 18

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Elizabeth,

Have you responded to my questions? I don't see a response but perhaps you sent a response.

Would you please acknowledge that you received my message.

If you cannot answer my questions, then let me know to whom to send my questions. The meeting is next Tuesday so we need a response.

Loretta

Loretta

On Fri, Jul 7, 2023 at 1:04 PM Loretta Lopez <[ljlopezmsl@gmail.com](mailto:ljlopezmsl@gmail.com)> wrote:

Elizabeth,

I received the notice of the public meeting on July 18 at 6:00 pm at City Hall. The notice is confusing.

The statement on the notice refers to Reasons for Re-notice and refers to eliminating the quasi-judicial process and the EBCC. Then there is basic reference to Land Use Process I and II. There is also a statement about the Critical Areas Land Use Permit as a Process II decision.

As explained in the published notice, PSE's CUP is a Process I land use decision, and the critical areas land use permit is a Process II land use decision. I do not believe the notice is either ambiguous or confusing.

Is the purpose of the meeting for residents to comment on the replacement of 115Kv lines with 230 Kv lines? If so, the notice is not sufficient.

The notice states that this is a re-notice and that the July 18 meeting is the second public meeting. There is no reference to the first public meeting, the date and the purpose of the first public meeting. Since the EBCC no longer exists and the quasi judicial appeal to the City Council no longer exists, then the July 18 meeting is not the 2nd meeting but the first meeting. What is the basis for the City's position that the July 18 meeting is the second public meeting?

The July 18, 2023 meeting is the 2<sup>nd</sup> meeting on PSE's CUP application. I believe you attended the first meeting, which was held on June 1, 2021. Consistent with the requirements in the Land Use Code, the City scheduled the first public meeting as early in the land use process as possible and published notice of the meeting in the May 13, 2021 Notice of Application. Consistent with the Land Use Code, the City is holding this second public meeting prior to the public hearing required by LUC 20.35.127.

1. The City should re-schedule the meeting for the Fall when more residents will be available to attend. I have reminded the City on more than one occasion to not schedule the meeting in the middle of the summer holiday. I have previously responded to this concern, see email dated 6/30.

2. If the purpose of the July 18 public meeting is to gather comments about PSE's proposal to replace the 115Kv lines on wooden poles with 230Kv line on \_\_\_ foot metal poles then the City should correct the notice and make the purpose of the meeting clear. The current notice does not communicate the purpose of the meeting. Please see the "Description" section of the notice. The project is adequately described in the description and clearly defines the context for the project. The meeting itself is noticed as a "Public Meeting". This is consistent with the Land Use Code requirement at LUC 20.20.250.C.1.b to "Hold an informational public meeting prior to the public hearing required by LUC 20.35.137.....". The notice in no way deviates from that code requirement. We take public comment during these types of meetings, and we provide information about the project and the process. All of those things will take place during the meeting. As you already know (or should already know, given the content of the published notice and your past participation in the land use process), the informational public meetings required by LUC 20.35.127 and LUC 20.20.250.C.1.b are not public hearings.

Loretta

## Pittman, Reilly

---

**From:** Pittman, Reilly  
**Sent:** Wednesday, July 12, 2023 11:24 AM  
**To:** Arash Nasibi  
**Cc:** Nanneh Chehras  
**Subject:** RE: Energize Eastside Notice

Hi Arash,

Thank you for sending me your questions which are probably best answered by PSE since this is an issue specific to the project plan. I will forward your email to the PSE contacts for follow up.

In addition, there will be representatives from PSE at the public meeting at City Hall next week on 7/18 at 6pm. They will have some project level information and may be able to assist you at this meeting.

Please let me know if you need anything further or have any questions about the review process.



### Reilly Pittman

Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
Pronouns: He/Him/His

*\*New!\* Visit our [Virtual Permit Center](#) to schedule a one-on-one virtual appointment with review staff for general permitting questions.*

---

**From:** Arash Nasibi <arash.nasibi@gmail.com>  
**Sent:** Sunday, July 2, 2023 3:40 PM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**Cc:** Nanneh Chehras <nannehchehras@gmail.com>  
**Subject:** Energize Eastside Notice

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Reilly,

My wife (Nanneh, cc'd) and I are residents on 138th AVE SE in Bellevue. I recently received the attached notice about a public meeting regarding the Energize Eastside project. Our backyard has power lines running above it that are part of this project.

We are not opposed to the project as I know many homeowners are; however, there is one specific tree in our backyard that has been marked for elimination (amongst many) that we would like to contest. Based on the positioning of the new power poles and lines, we don't believe that this tree would ever cause any issues with respect to the power lines. On the other hand, it adds significant character to our backyard and the neighborhood. All the other trees that have been marked for elimination in our yard we can understand why they need to go based on their proximity to the new lines.

Who would be the best person to discuss this matter with? Is this an issue to take up with the City, PSE, or both?

Thanks in advance for your time and assistance.

Regards,

Arash Nasibi

----- Forwarded message -----

From: **Arash Nasibi** <[arash.nasibi@gmail.com](mailto:arash.nasibi@gmail.com)>

Date: Sun, Jul 2, 2023 at 3:30 PM

Subject: bellevue

To: Arash Nasibi <[arash.nasibi@gmail.com](mailto:arash.nasibi@gmail.com)>



**Project Name:** Er

**Location:** Within  
northern city limit

**Neighborhood:** R

## Pittman, Reilly

---

**From:** Stead, Elizabeth  
**Sent:** Tuesday, July 11, 2023 8:42 AM  
**To:** NORMAN HANSEN  
**Cc:** cense-board@googlegroups.com; Bridle Trails Community Club Board and Advisors; Council; Pittman, Reilly; williambarnesconsulting@gmail.com; pmcgiffert@aol.com  
**Subject:** RE: ENERGIZE EASTSIDE, City of Bellevue Re-Notice of Application and Notice of Public Meeting 6-29-23

Norm, please see responses embedded in your email below. Hope this helps, Liz

---

**From:** NORMAN HANSEN <hansennp@aol.com>  
**Sent:** Monday, July 10, 2023 2:21 PM  
**To:** Stead, Elizabeth <estead@bellevuewa.gov>  
**Cc:** cense-board@googlegroups.com; Bridle Trails Community Club Board and Advisors <btccadvisors@googlegroups.com>; Council <Council@bellevuewa.gov>; Pittman, Reilly <RPittman@bellevuewa.gov>; williambarnesconsulting@gmail.com; pmcgiffert@aol.com  
**Subject:** ENERGIZE EASTSIDE, City of Bellevue Re-Notice of Application and Notice of Public Meeting 6-29-23

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To: Elizabeth Stead, Land Use Director,

We have several questions regarding the public meeting:

- 1/ What is the purpose of the meeting? **Bellevue Land Use Code, 20.20.255.C.1.b requires the city hold two informational meetings for applications for electrical utility facilities. One is required for the Conditional Use Permit application type, and one additional per the electrical utilities facilities code requirements. As the notice indicates this is the second required public meeting.**
- 2/ Are verbal comments from the public recorded in the permit file? **Notes are taken by the planners and verbal comments will be noted in aggregate and responded to in the city's recommendation to the Hearing Examiner. Making a verbal comment does not give any member of the public standing as a Party of Record, only substantive written comments confer that standing.**
- 3/ What can be addressed in the addendum to th EIS and what is the expected timing? **We can provide some further comment at the public meeting.**
- 4/How do we request an update due to technical advances and and other alternatives that are now feasible? **Any requests for further review should be made in writing to the land use planner for the project Reilly Pittman.**

Thank you for your timely response,  
Norm Hansen, CENSE (Coalition of Eastside Neighborhoods for Sensible Energy), President

[Sent from the all new AOL app for Android](#)

On Thu, Jun 29, 2023 at 1:15 PM, noreply\_WPB <noreply\_WPB@bellevuewa.gov> wrote:

You are a party of record to a notice published in the Weekly Permit Bulletin on June 29, 2023. Following is that notice. If you have any questions, please contact [Jackie Donovan](#).

## RE-NOTICE OF APPLICATION AND NOTICE OF PUBLIC MEETING

**Project Name:** Energize Eastside Bellevue North Segment

**Location:** Within PSE's existing transmission line corridor north of the Lakeside Substation (13615 SE 26th St) to the northern city limits (5755 140th Ave NE).

**Neighborhood Area:** Richards Valley, Southeast Bellevue, Wilburton/NE 8th St., Bel-Red and Bridle Trails

**File Number:** 21-104991 LB and 21-104989 LO

**Reason for Re-notice:** On August 1, 2022, the Bellevue City Council adopted Ordinance 6673, which eliminated quasi-judicial appeals to the City Council from Hearing Examiner decisions and recommendations in Process I and Process III land use matters. As a result of Ordinance 6673 and corresponding changes to state law that ended the existence of the East Bellevue Community Council (EBCC), this Conditional Use Permit application (LB) is now a Process I land use decision that no longer requires City Council or EBCC review and approval. This Process I review requires a recommendation from the Director of Development Services to the City's Hearing Examiner who will hold a public hearing on the application prior to issuing the City land use decision. The Critical Areas Land Use Permit remains a Process II decision, which is issued by the Director of Development Services and appealable to the City's Hearing Examiner.

**Description:** Conditional Use and Critical Areas permits for the North Bellevue Segment of the Energize Eastside project. Puget Sound Energy, Inc. (PSE) project includes a new substation in Bellevue ("Richards Creek substation") and the upgrade of 18 miles of two existing 115 kV transmission lines with 230 kV lines (collectively referred to as the "Energize Eastside") from Renton to Redmond. In Bellevue, PSE is proposing to apply for permits to construct the project in two phases. The first phase ("South Bellevue Segment") included upgrading 3.3 miles (Bellevue Portion) of existing 115 kV lines with 230 kV lines between the Lakeside substation and the southern city limits of Bellevue and land use permits have been approved. The subject proposal for the North Bellevue Segment includes the replacement and upgrading of approximately 5.2 miles of existing 115 kV transmission lines with 230 kV lines north of the Lakeside substation to the northern city limits of Bellevue. This upgrade includes replacing existing wooden H-frame poles with steel monopoles in the existing transmission line corridor. Critical Areas (Steep Slopes, Wetlands, Streams and Habitat of Species of Local Importance) are located within the transmission line corridor.

**Approvals Required:** Conditional Use Permit approval, Critical Areas Land Use Permit approval and ancillary permits and approvals

**SEPA:** A Final Environmental Impact Statement (Final EIS) for the Project was prepared and released in March 2018 (File # 15-139122 LE). For more information about the Final EIS, see: <http://www.energizeeastsideeis.org>. An addendum to the EIS is to be prepared, pursuant to WAC 197-11-706, to reflect changes to the Wetland Rating System for Western Washington that revised wetland buffer and to capture other changes that have occurred since the EIS was issued in 2018.

**Minimum Comment Period Ends:** Public comments are accepted until the City issues a decision and recommendation on the land use applications.

**Public Meeting:** The second required public meeting will be held at Bellevue City Hall on **July 18, 2023** at **6pm in room 1E-112**. The meeting can also be attended virtually via Microsoft Teams per below.

**Join on your computer, mobile app or room device:** [Click here to join the meeting](#)

**Meeting ID:** 235 513 156 917 **Passcode:** NsmoR

**Dial In (audio only):** 206-452-7011 **Phone ID:** 873 551 094#

**Date of Application:** March 11, 2021

**Completeness Date:** April 8, 2021

**Notice of Application Date:** May 13, 2021

**Applicant Contact:** Bradley Strauch, Puget Sound Energy, [bradley.strauch@pse.com](mailto:bradley.strauch@pse.com)

**City Planner Contact:** Reilly Pittman, 425-452-4350, [RPittman@bellevuewa.gov](mailto:RPittman@bellevuewa.gov)

Charolett Henderson

*Administrative Assistant*

Development Services, City of Bellevue

[chenderson@BellevueWa.Gov](mailto:chenderson@BellevueWa.Gov)

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Thursday, August 26, 2021 2:20 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: Response to heat dome power outages  
**Attachments:** PSE 2021 Heat Wave Fact Sheet.pdf

Chair Hummer and EBCC members,

I am forwarding written communication from David Hoffman regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Hoffman or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

---

**From:** Hoffman, David <David.Hoffman@pse.com>  
**Sent:** Wednesday, August 25, 2021 4:12 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** FW: Response to heat dome power outages

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

FYI.

**David Hoffman**  
Local Government Affairs & Public Policy Manager  
PUGET SOUND ENERGY  
Office 425.456.2522  
Cell 206.605.3836  
<http://pse.com>



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**From:** Hoffman, David  
**Sent:** Wednesday, August 25, 2021 4:11 PM  
**To:** 'Don Marsh' <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Subject:** RE: Response to heat dome power outages

Mr. Marsh,

Please find the attached document that explains the impacts of the late-June 2021 heat dome event on PSE's system.

Sincerely,

**David Hoffman**

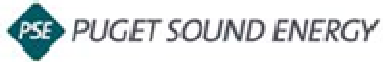
Local Government Affairs & Public Policy Manager

PUGET SOUND ENERGY

Office 425.456.2522

Cell 206.605.3836

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**From:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>

**Sent:** Monday, August 09, 2021 12:15 PM

**To:** Hoffman, David <[David.Hoffman@pse.com](mailto:David.Hoffman@pse.com)>; Swayne, Andy <[andy.swayne@pse.com](mailto:andy.swayne@pse.com)>

**Cc:** 'council@bellevuewa.gov' <[council@bellevuewa.gov](mailto:council@bellevuewa.gov)>; 'citycouncil@newcastlewa.gov' <[citycouncil@newcastlewa.gov](mailto:citycouncil@newcastlewa.gov)>; EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)>; [washington-clean-energy-coalition-pse-efforts@googlegroups.com](mailto:washington-clean-energy-coalition-pse-efforts@googlegroups.com)

**Subject:** RE: Response to heat dome power outages

**CAUTION - EXTERNAL EMAIL**

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For mobile - forward to [abuse@pse.com](mailto:abuse@pse.com)

Dear Mr. Hoffman,

We understand that PSE has a lot on its plate. Not only is the company required to switch approximately 2/3 of its electric generation away from fossil fuels to clean renewable sources on a relatively short timeline, but Washington's Clean Energy Transformation Act requires the company to do so in a way that equitably shares the costs and benefits among all income groups and communities.

At the same time, PSE must improve the reliability of our electricity, especially during extreme temperature events like the Pacific Northwest "heat dome" and Texas deep freeze, both of which caused hundreds of deaths. Loss of electricity during extreme weather isn't just an inconvenience for many people. It could be a direct contributor to their demise.

On July 31, we asked PSE to provide an accounting of equipment failure types that caused widespread outages for more than 10,000 customers during the heat dome event on June 26-28 (see email below). You replied that PSE is preparing "information on system-wide operations during the heat dome."

We ask:

- By what date will this information be published?
- Will it include an accounting of failure types that we asked for on July 31?

I am the Eastside's representative on Sierra Club's Washington State Energy Committee (representing approximately 50,000 Sierra Club members within PSE's service territory). I also lead the Washington Clean Energy Coalition, comprised

of many environmental organizations that participate in PSE's Integrated Resource Plans and PSE's 2022 Clean Energy Implementation Plan. These organizations need the requested information to adequately serve the interests of our various constituents as we participate in the development of the Clean Energy Implementation Plan. I have copied local city councils so that they may also be informed and represent their constituents.

I am in regular contact with the Washington Utilities and Transportation Commission as well as state legislators. Your answers to these questions may be of interest to these bodies as well. Please consider your response with this wider audience in mind.

Respectfully,

Don Marsh  
Eastside rep, Sierra Club Washington State Energy Committee  
Lead, Washington Clean Energy Coalition  
Stakeholder, PSE 2017 Integrated Resource Plan Advisory Group  
Advisor, PSE 2019 Integrated Resource Plan Technical Advisory Group  
Primary Stakeholder, PSE 2021 Integrated Resource Plan Advisory Group  
Stakeholder, PSE 2022 Clean Energy Implementation Plan  
Representative, PSE 2022 General Rate Case  
President and Co-founder, Coalition of Eastside Neighborhoods for Sensible Energy

---

**From:** Don Marsh

**Sent:** Saturday, July 31, 2021 7:36 AM

**To:** Hoffman, David <[David.Hoffman@pse.com](mailto:David.Hoffman@pse.com)>; 'andy.swayne@pse.com' <[andy.swayne@pse.com](mailto:andy.swayne@pse.com)>

**Cc:** 'council@bellevuewa.gov' <[council@bellevuewa.gov](mailto:council@bellevuewa.gov)>; 'citycouncil@newcastlewa.gov' <[citycouncil@newcastlewa.gov](mailto:citycouncil@newcastlewa.gov)>; [washington-clean-energy-coalition-pse-efforts@googlegroups.com](mailto:washington-clean-energy-coalition-pse-efforts@googlegroups.com)

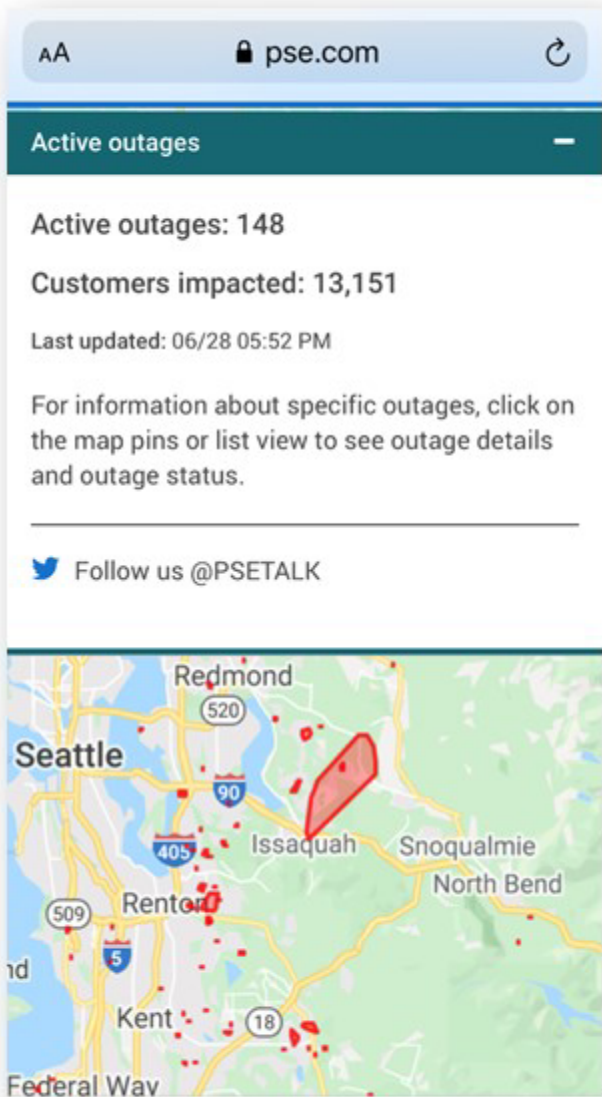
**Subject:** Response to heat dome power outages

To: David Hoffman, PSE Local Government Affairs and Public Policy Manager  
Andy Swayne, PSE Senior Municipal Liaison Manager

Re: Response to heat dome power outages

Dear Mr. Hoffman and Mr. Swayne,

The "heat dome" event that hit the Pacific Northwest on June 26-28 caused hundreds of power outages that impacted thousands of PSE customers. As you know, loss of electric service when temperatures exceed 100 degrees can be uncomfortable and costly for our citizens. In some cases, it can be life threatening.



As we collectively strive to electrify our buildings, transportation, and commerce to reduce our reliance on climate-changing fossil fuels, the reliability of our electric service will become ever more important for the safety of our citizens and the health of our economy.

It is important for the public and our elected leaders to understand what PSE is doing to harden our electric grid against the growing probability of future heat waves and other extreme weather events. **Please share PSE’s high-level vision of what the company plans to do during the next five years to prepare our communities for future weather emergencies.**

It is helpful for us to understand the existing vulnerabilities of our electric grid. The following table lists possible causes of outages that occurred during the June 26-28 period in Bellevue, Newcastle, and throughout PSE’s service territory. Please supply the numbers of incidents for each type of failure and send it back to the CC’d recipients, including the Bellevue and Newcastle city councils.

Failure type	Incidents in Bellevue	Incidents in Newcastle	Total incidents
Neighborhood transformer	-	-	-



Substation transformer	-	-	-
Regional transformer	-	-	-
Distribution line (tree-related)	-	-	-
Distribution line (not tree-related)	-	-	-
Distribution line (underground)	-	-	-
Transmission line	-	-	-
Other substation component	-	-	-
Other equipment on customer's property	-	-	-
Other failures	-	-	-

**If our information request cannot be fulfilled before August 6, please provide an estimated date for when this information can be shared.**

Thank you for helping us understand PSE's role in preparing for changing climate conditions in our region.

Sincerely,

Don Marsh  
Sierra Club Washington State Energy Committee  
Lead, Washington Clean Energy Coalition  
Stakeholder, PSE IRP and CEIP Advisory Groups

CC:

Bellevue City Council  
Newcastle City Council  
Washington Clean Energy Coalition



## How Puget Sound Energy handled the historic 2021 heat dome

The most severe heat wave in the history of the Pacific Northwest broke all-time temperature records. The soaring temperatures between June 26 and July 6 also produced unprecedented demand on our electric grid and our crews. Throughout the heat wave, our operations teams were in an all-out sprint to keep up with demand.

### How we prepared for the heat wave

As we regularly do, the week prior to the heat wave, we proactively prepared for the forecasted weather event and identified potential areas of concern within our service territory. Because the extreme temperatures were expected to produce corresponding high power demand, we took a number of actions to increase system resiliency before and during the extreme heat. These included:

- Delaying planned maintenance and construction where feasible;
- Restoring the system to normal configuration where possible;
- Analyzing energy supply and system capacity based on the expected maximum forecasted energy flows;
- Identifying and implementing options to ensure there was adequate energy supply available for our customers;
- Identifying and trimming potentially dangerous vegetation; and
- Making resource readiness a key management focus and strategy.

### Customer service impact

The table below summarizes the actual power restorations that occurred during the heat dome and illustrates specific regional impacts of this weather event. Of note, between June 26 and July 6, we restored power to a total of 114,316 customers. For context, a normal 3-day period in June typically sees outages to approximately 10,500 customers; a 3-day winter storm, in contrast, typically causes outages to 150,000 or more customers. The peak customer outage count was 15,015 customers at approximately 5 p.m. on Monday, June 28.

### Outages by County

County	Total Number of Outages	Total Customer Minutes Interrupted	Total Customers Interrupted	Average Outage Duration per Customer Interruption (hr:min)
Whatcom	83	1,591,572	8,902	2:58
Skagit	67	418,357	4,871	1:25
Island	33	219,668	777	4:42
King	518	14,258,556	62,489	3:48
Kittitas	20	850,051	6,879	2:03
Pierce	66	1,709,686	7,220	3:56
Thurston	92	594,360	2,732	3:37
Kitsap	72	3,495,629	20,446	2:50
<b>Total</b>	<b>951</b>	<b>23,137,879</b>	<b>114,316</b>	<b>3:22</b>

### Number of Outages by Category (June 26 – July 6)

Year	# of Equipment Failure	# of Vegetation Outages	# of Scheduled Outages	Other
2018	105	57	69	190

2019	125	46	51	203
2020	139	58	65	144
2021	610	101	30	210

In short, the temperature stress caused by the heat dome resulted in more equipment failures in our system during the twelve day period of 2021 than the three previous years during the same period combined.

## Infrastructure resiliency and adjustments

The system has experienced summer residential electrical load growth largely due to the addition of residential air conditioning (in particular the use of plug-in air conditioners). Although we implemented proactive measures to support our customers' needs during the heatwave, increased summer load was a driving factor contributing to the increased number of neighborhood service transformers requiring replacement, which, in turn, resulted in an unusually high number of power outages.

Our grid operators collaborated closely throughout the entire event to monitor load levels and, where possible, strategically shift energy flows based on system conditions and forecasts used to estimate expected electric loads.

## Keeping crews safe

The extreme heat had a significant impact on the productivity of field personnel performing repairs and service restorations.

We proactively emphasized to all field personnel the importance of following all safety guidelines for working in extreme heat, particularly for those crew members donning a full suite of protective gear. To keep our crews safe, productivity was substantially lower than what is possible during winter weather related events, as crews needed to take breaks more often to work safely. This emphasizes the need for flexibility and redundancy in the grid to reduce the dependency on human intervention and response.



## Lessons learned and moving forward

Electric demand during the heat wave drove our summer peak load to record-setting levels that exceeded the previous record by 15%. Actual loads on the hottest day (June 28, 2021) exceeded forecasts from the day before by approximately 400MW. Additionally, the actual loads exceeded forecasts prepared one hour earlier by approximately 200MW, highlighting the inherent differences between actual use and forecasting data. We learned valuable lessons during this unprecedented heat event:

- **Solar resources do not perform at nameplate output rating during extreme heat events.**
  - Peak solar generation was approximately 60% of the installed nameplate rating, but only approximately 30% of nameplate rating at the time of peak demand. Hours of peak electrical demand occurred in the late afternoon hours between approximately 4 p.m. and 8 p.m. while solar generation output occurred closer to the middle of the day when the sun was directly overhead.
  - A better understanding of the load shape of solar Distributed Energy Resources (DERs) during peak energy demand will help us plan for increased levels of solar DERs in the future. One likely outcome will be that other infrastructure investments will be required to maintain a reliable electrical grid as the number of solar DERs in the system increase.
- **AMI (Advanced Metering Infrastructure) continues to prove to be a valuable planning tool.**
  - AMI is the current standard for metering technology. It uses two-way communication and on-board memory to send meter data through a secured wireless network. Aggregated AMI data can help us better understand both trending and real-time predictive failure models for service transformers. AMI data also can help us have better visibility on local transformer utilization, load curves and, thus, failure risk.
- **Our operational capacity, grid resiliency and crew safety will be improved during future high heat events after key projects are operational.**
  - We are responsible for ensuring the bulk electric system and distribution infrastructure provides enough operational flexibility during high summer heat temperature events. Paramount to this effort is the completion of both the Sammamish-Juanita transmission line and Energize Eastside projects, and the initiation of additional projects shown to be needed by our latest load forecast.

## Pittman, Reilly

---

**From:** Arash Nasibi <arash.nasibi@gmail.com>  
**Sent:** Sunday, July 2, 2023 3:40 PM  
**To:** Pittman, Reilly  
**Cc:** Nanneh Chehras  
**Subject:** Energize Eastside Notice

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Reilly,

My wife (Nanneh, cc'd) and I are residents on 138th AVE SE in Bellevue. I recently received the attached notice about a public meeting regarding the Energize Eastside project. Our backyard has power lines running above it that are part of this project.

We are not opposed to the project as I know many homeowners are; however, there is one specific tree in our backyard that has been marked for elimination (amongst many) that we would like to contest. Based on the positioning of the new power poles and lines, we don't believe that this tree would ever cause any issues with respect to the power lines. On the other hand, it adds significant character to our backyard and the neighborhood. All the other trees that have been marked for elimination in our yard we can understand why they need to go based on their proximity to the new lines.

Who would be the best person to discuss this matter with? Is this an issue to take up with the City, PSE, or both?

Thanks in advance for your time and assistance.

Regards,

Arash Nasibi

----- Forwarded message -----

**From:** Arash Nasibi <[arash.nasibi@gmail.com](mailto:arash.nasibi@gmail.com)>  
**Date:** Sun, Jul 2, 2023 at 3:30 PM  
**Subject:** bellevue  
**To:** Arash Nasibi <[arash.nasibi@gmail.com](mailto:arash.nasibi@gmail.com)>

**Project Name:** Er

**Location:** Within  
northern city limit

**Neighborhood:** F

## Pittman, Reilly

---

**From:** Pittman, Reilly  
**Sent:** Friday, August 13, 2021 9:55 AM  
**To:** Loretta Lopez  
**Cc:** Stead, Elizabeth; Warren Halvorsen; hansennp@aol.com; Karen Esayian  
**Subject:** RE: Staff report/Meeting/Hearing/PSE project

Hi Loretta,

The project is still under review and there is no date set for when a staff report might be issued. There is also no hearing date set and a hearing will not be occurring in October or November. The 2<sup>nd</sup> public meeting will also occur before any staff report is issued. The meeting and the eventual staff report will both be noticed in the City's permit bulletin and on the website for the Energize Eastside project. Notice of the hearing will also be mailed to all parties of record.



### Reilly Pittman

Acting Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
Pronouns: He/Him/His

*\*New!\* Visit our [Virtual Permit Center](#) to schedule a one-on-one virtual appointment with review staff for general permitting questions.*

---

**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Thursday, August 12, 2021 8:17 AM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**Cc:** Stead, Elizabeth <estead@bellevuewa.gov>; Warren Halvorsen <whalvrsn1@frontier.com>; hansennp@aol.com; Karen Esayian <kesayian@aol.com>  
**Subject:** Staff report/Meeting/Hearing/PSE project

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi Reilly,

I am checking on the timeline on the PSE transmission line project.

Does the City have an estimated completion date for the staff report?

Liz said that the City would organize a meeting on the North Segment. What is the estimated date of the meeting?

Many of us are planning our fall schedules and trips. We want to plan around the hearing. Does the City plan to have the hearing on the project in October or November? Or will the hearing be in 2022?

Thank you.

Loretta



## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Tuesday, August 10, 2021 8:52 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: Response to heat dome power outages

Chair Hummer and EBCC members,

I am forwarding written communication from Don Marsh regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Marsh or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Friday, August 06, 2021 4:57 PM  
**To:** Hoffman, David <David.Hoffman@pse.com>  
**Cc:** Council <Council@bellevuewa.gov>; EBCC <EBCC@bellevuewa.gov>; citycouncil@newcastlewa.gov; robw@newcastlewa.gov  
**Subject:** RE: Response to heat dome power outages

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Mr. Hoffman,

Thank you for your timely response to my inquiry. However, it is important to correct several misstatements:

1. Your email repeats PSE's earlier claim that I am "an adverse litigant in an active proceeding on this project." Although CENSE has been a litigant in the past, there is no such litigation occurring at this time. There are at least two land use proceedings in Newcastle and Bellevue that are currently in a **public comment phase**. In order to make informed comments, we are seeking data regarding the most stressful peak demand events that PSE has experienced in recent years. Whether or not these requests are relevant to the case for Energize Eastside, PSE's categorical refusal to answer any questions based on who is inquiring is concerning and possibly of questionable legality.
2. We look forward to hearing more about the "operational challenges that occurred during the 2021 heat event." Please include in your descriptions any undue stress that was placed on the transmission lines and transformers that you propose to upgrade through Energize Eastside.
3. The earlier email claims that you have produced "hundreds of responses to [my] requests for information." My email records show 15 responses to my two email addresses ([don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com) and



[donmarsh@cense.org](mailto:donmarsh@cense.org)) since 2014. There were some additional responses that were automated replies. Your claim of “hundreds of responses” is not accurate.

We are curious to know if PSE will refuse any more information requests from citizens who have a stake in the outcome of this project. Please clarify.

Don Marsh

---

**From:** Hoffman, David <[David.Hoffman@pse.com](mailto:David.Hoffman@pse.com)>  
**Sent:** Friday, August 06, 2021 4:13 PM  
**To:** Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
**Subject:** re: Response to heat dome power outages

Mr. Marsh,

This response follows an earlier reply from PSE this week to the information request you submitted as the President of CENSE, an active litigant opposing PSE’s Energize Eastside transmission line project. The Energize Eastside project is designed to bring PSE’s transmission system into compliance with mandatory federal transmission planning criteria and requires permits from eastside jurisdictions including the cities of Bellevue and Newcastle, which are the specific targets of your July 31 request. You have filed motions and/or appeals in both jurisdictions, but no relief has been granted against PSE.

In your July 31 email you specifically inquire about outages only in Bellevue and Newcastle as part of your involvement in the Sierra Club, Washington Clean Energy Coalition and IRP stakeholder. It is important to note that specific jurisdictional boundaries are irrelevant to the transmission system; due to the integrated nature of the grid, outages in one area impact other areas of the system.

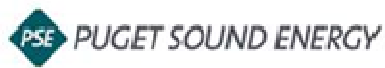
The Energize Eastside corridor is an existing gap in the transmission grid that needs to be addressed to remedy current vulnerabilities. This was evident with the operational challenges that arose during the 2021 heat event. These challenges confirmed the vulnerabilities that Energize Eastside planning studies have identified.

We recognize that many PSE customers and stakeholders may be interested in general data on the recent extreme heat event and related outages. Therefore, we are preparing information on system-wide operations during the heat dome, including PSE’s regular and future efforts to prepare for weather events that stress our system well beyond what is contemplated in our planning standards. That analysis will be circulated to you and others when completed.

While we appreciate your interest in PSE matters, our extensive experience (as documented in hundreds of PSE responses to your requests for information on electricity data in Bellevue and Newcastle) leaves us with significant concerns that additional responses may be misused to confuse the general public and stakeholders as you have done in the past.

Regards,

**David Hoffman**  
Local Government Affairs & Public Policy Manager  
PUGET SOUND ENERGY  
Office 425.456.2522  
Cell 206.605.3836  
<http://pse.com>



Learn about our commitment to clean energy at [pse.com/TOGETHER](http://pse.com/TOGETHER)

Cc:  
Sierra Club  
Newcastle City Council  
Bellevue City Council  
Washington Clean Energy Coalition

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Tuesday, August 10, 2021 8:53 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: Response to heat dome power outages

Chair Hummer and EBCC members,

I am forwarding written communication from Norm Hansen regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Hansen or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** NORMAN HANSEN <hansennp@aol.com>  
**Sent:** Friday, August 06, 2021 7:04 PM  
**To:** don.m.marsh@hotmail.com; cense-board@googlegroups.com  
**Cc:** Council <Council@bellevuewa.gov>; EBCC <EBCC@bellevuewa.gov>; citycouncil@newcastlewa.gov; robw@newcastlewa.gov  
**Subject:** RE: Response to heat dome power outages

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

More of the same from the PSE employees who do not make the decisions. Palm Desert has consistent temps over 110 degrees with mostly underground power. PSE has not entered the modern age and we are the recipients. We should ask the PSE management that that make the decisions  
PSE has a record of being in the 3rd and 4th quartile for reliability when compared with their peers.  
They are not putting the customer first. Norm

On Friday, August 6, 2021 Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)> wrote:

Mr. Hoffman,

Thank you for your timely response to my inquiry. However, it is important to correct several misstatements:

Your email repeats PSE's earlier claim that I am "an adverse litigant in an active proceeding on this project." Although CENSE has been a litigant in the past, there is no such litigation occurring at this time. There are at least two land use proceedings in Newcastle and Bellevue that are currently in a public comment phase. In order to make informed comments, we are seeking data regarding the most stressful peak demand events that PSE has experienced in recent years. Whether or not these requests are relevant to the case for Energize Eastside, PSE's categorical refusal to answer any questions based on who is inquiring is concerning and possibly of questionable legality.

We look forward to hearing more about the "operational challenges that occurred during the 2021 heat event." Please include in your descriptions any undue stress that was placed on the transmission lines and transformers that you propose to upgrade through Energize Eastside.

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We are curious to know if PSE will refuse any more information requests from citizens who have a stake in the outcome of this project. Please clarify.

Don Marsh

From: Hoffman, David <[David.Hoffman@pse.com](mailto:David.Hoffman@pse.com)>  
Sent: Friday, August 06, 2021 4:13 PM  
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Subject: re: Response to heat dome power outages

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Regards,

David Hoffman

Local Government Affairs & Public Policy Manager

PUGET SOUND ENERGY

Office 425.456.2522

Cell 206.605.3836

<http://pse.com>

Learn about our commitment to clean energy at [pse.com/TOGETHER](http://pse.com/TOGETHER)

Cc:

Sierra Club

Newcastle City Council

Bellevue City Council

Washington Clean Energy Coalition

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To view this discussion on the web visit <https://groups.google.com/d/msgid/cense-board/CO6PR14MB51706038DC972FCBAB79F1E9A2F39%40CO6PR14MB5170.namprd14.prod.outlook.com>.

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Tuesday, August 10, 2021 8:54 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: Response to heat dome power outages

Chair Hummer and EBCC members,

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Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

---

**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Monday, August 09, 2021 12:15 PM  
**To:** Hoffman, David <David.Hoffman@pse.com>; andy.swayne <andy.swayne@pse.com>  
**Cc:** Council <Council@bellevuewa.gov>; 'citycouncil@newcastlewa.gov' <citycouncil@newcastlewa.gov>; EBCC <EBCC@bellevuewa.gov>; washington-clean-energy-coalition-pse-efforts@googlegroups.com  
**Subject:** RE: Response to heat dome power outages

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Mr. Hoffman,

We understand that PSE has a lot on its plate. Not only is the company required to switch approximately 2/3 of its electric generation away from fossil fuels to clean renewable sources on a relatively short timeline, but Washington's Clean Energy Transformation Act requires the company to do so in a way that equitably shares the costs and benefits among all income groups and communities.

At the same time, PSE must improve the reliability of our electricity, especially during extreme temperature events like the Pacific Northwest "heat dome" and Texas deep freeze, both of which caused hundreds of deaths. Loss of electricity during extreme weather isn't just an inconvenience for many people. It could be a direct contributor to their demise.

On July 31, we asked PSE to provide an accounting of equipment failure types that caused widespread outages for more than 10,000 customers during the heat dome event on June 26-28 (see email below). You replied that PSE is preparing "information on system-wide operations during the heat dome."

We ask:

- By what date will this information be published?
- Will it include an accounting of failure types that we asked for on July 31?

I am the Eastside's representative on Sierra Club's Washington State Energy Committee (representing approximately 50,000 Sierra Club members within PSE's service territory). I also lead the Washington Clean Energy Coalition, comprised of many environmental organizations that participate in PSE's Integrated Resource Plans and PSE's 2022 Clean Energy Implementation Plan. These organizations need the requested information to adequately serve the interests of our various constituents as we participate in the development of the Clean Energy Implementation Plan. I have copied local city councils so that they may also be informed and represent their constituents.

I am in regular contact with the Washington Utilities and Transportation Commission as well as state legislators. Your answers to these questions may be of interest to these bodies as well. Please consider your response with this wider audience in mind.

Respectfully,

Don Marsh

Eastside rep, Sierra Club Washington State Energy Committee

Lead, Washington Clean Energy Coalition

Stakeholder, PSE 2017 Integrated Resource Plan Advisory Group

Advisor, PSE 2019 Integrated Resource Plan Technical Advisory Group

Primary Stakeholder, PSE 2021 Integrated Resource Plan Advisory Group

Stakeholder, PSE 2022 Clean Energy Implementation Plan

Representative, PSE 2022 General Rate Case

President and Co-founder, Coalition of Eastside Neighborhoods for Sensible Energy

---

**From:** Don Marsh

**Sent:** Saturday, July 31, 2021 7:36 AM

**To:** Hoffman, David <[David.Hoffman@pse.com](mailto:David.Hoffman@pse.com)>; 'andy.swayne@pse.com' <[andy.swayne@pse.com](mailto:andy.swayne@pse.com)>

**Cc:** 'council@bellevuewa.gov' <[council@bellevuewa.gov](mailto:council@bellevuewa.gov)>; 'citycouncil@newcastlewa.gov'

<[citycouncil@newcastlewa.gov](mailto:citycouncil@newcastlewa.gov)>; [washington-clean-energy-coalition-pse-efforts@googlegroups.com](mailto:washington-clean-energy-coalition-pse-efforts@googlegroups.com)

**Subject:** Response to heat dome power outages

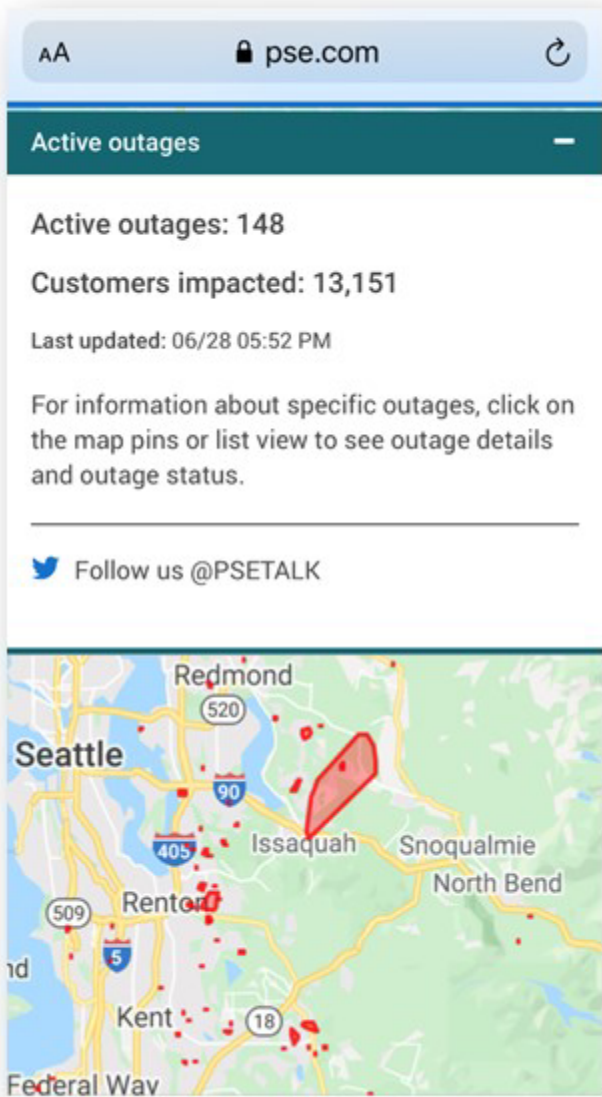
To: David Hoffman, PSE Local Government Affairs and Public Policy Manager

Andy Swayne, PSE Senior Municipal Liaison Manager

Re: Response to heat dome power outages

Dear Mr. Hoffman and Mr. Swayne,

The "heat dome" event that hit the Pacific Northwest on June 26-28 caused hundreds of power outages that impacted thousands of PSE customers. As you know, loss of electric service when temperatures exceed 100 degrees can be uncomfortable and costly for our citizens. In some cases, it can be life threatening.



As we collectively strive to electrify our buildings, transportation, and commerce to reduce our reliance on climate-changing fossil fuels, the reliability of our electric service will become ever more important for the safety of our citizens and the health of our economy.

It is important for the public and our elected leaders to understand what PSE is doing to harden our electric grid against the growing probability of future heat waves and other extreme weather events. **Please share PSE’s high-level vision of what the company plans to do during the next five years to prepare our communities for future weather emergencies.**

It is helpful for us to understand the existing vulnerabilities of our electric grid. The following table lists possible causes of outages that occurred during the June 26-28 period in Bellevue, Newcastle, and throughout PSE’s service territory. Please supply the numbers of incidents for each type of failure and send it back to the CC’d recipients, including the Bellevue and Newcastle city councils.

Failure type	Incidents in Bellevue	Incidents in Newcastle	Total incidents
Neighborhood transformer	-	-	-



Substation transformer	-	-	-
Regional transformer	-	-	-
Distribution line (tree-related)	-	-	-
Distribution line (not tree-related)	-	-	-
Distribution line (underground)	-	-	-
Transmission line	-	-	-
Other substation component	-	-	-
Other equipment on customer's property	-	-	-
Other failures	-	-	-

**If our information request cannot be fulfilled before August 6, please provide an estimated date for when this information can be shared.**

Thank you for helping us understand PSE's role in preparing for changing climate conditions in our region.

Sincerely,

Don Marsh  
 Sierra Club Washington State Energy Committee  
 Lead, Washington Clean Energy Coalition  
 Stakeholder, PSE IRP and CEIP Advisory Groups

CC:

Bellevue City Council  
 Newcastle City Council  
 Washington Clean Energy Coalition

## Pittman, Reilly

---

**From:** Pittman, Reilly  
**Sent:** Friday, October 8, 2021 12:37 PM  
**To:** barbara\_hughes@hotmail.com  
**Cc:** Stead, Elizabeth  
**Subject:** RE: Questions to Heidi Bedwell about PSE project in BT

Hi Barbara,

The public notice and comment requirements related to land use applications in Land Use Code 20.35 state the City may respond to public comments. Comments are accepted and reviewed as part of any proposal but a direct response to every comment submitted is not mandatory or possible. We try to respond to comments but when there is such a large volume of comments for a specific project the comments are addressed and responded to as part of the City's decision process. Comments received are added to the public record and make the commentor a party of record which allows inclusion and involvement in future actions on a project.

The land use code, current project files, and the prior EIS record contain information that address your questions about process, notice, and the proposal itself. Your comments regarding attending the EBCC virtual meeting are noted but this meeting was held by the EBCC and we have no input into how the meeting is run or the agenda items for the meeting. As this proposal is in the initial stages of review some of the information you are asking may be subject to change. The best way to keep updated on a project is to review the submittal and updates that will be posted to the project website at the link I provided previously.

Reilly Pittman  
Acting Environmental Planning Manager  
Development Services Department  
425-452-4350  
rpittman@bellevuewa.gov  
Pronouns: He/Him/His

**\*New!\*** Visit our Virtual Permit Center to schedule a one-on-one virtual appointment with review staff for general permitting questions.

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

From: Barbara Hughes <barbara\_hughes@hotmail.com>  
Sent: Thursday, September 30, 2021 8:18 PM  
To: Barbara Hughes <barbara\_hughes@hotmail.com>; Pittman, Reilly <RPittman@bellevuewa.gov>  
Cc: Stead, Elizabeth <estead@bellevuewa.gov>; donmarsh@cense.org; Loretta Lopez <llopez@mstarlabs.com>; William Barnes <williambarnesconsulting@gmail.com>  
Subject: RE: Questions to Heidi Bedwell about PSE project in BT

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello again Reilly,

Thank you again for your response to me on 9/23/21.

I note your reply confirming that the EBCC has nothing to do with Bridle Trails, and only concerns the EBCC area within their jurisdiction. I am still unclear as to why Bridle Trails homeowners were invited to that meeting.

Moving on, your reply to me didn't answer any of my other questions! I actually would like specific answers to my individual questions. I took a long time to compose my email and write to you with my concerns. I am a 19+ years Bellevue homeowner and taxpayer, and this is the very first time I have written to the planning department with questions. I do expect you to answer my questions.

I look forward to your reply to my original letter, item by item. I have enclosed another copy of it for you. Many thanks,

Barbara Hughes  
13709 NE 48th Place, Bellevue, WA 98005

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

From: Barbara Hughes <barbara\_hughes@hotmail.com>  
Sent: Thursday, September 23, 2021 1:53 PM  
To: Pittman, Reilly <RPittman@bellevuewa.gov>  
Cc: Stead, Elizabeth <estead@bellevuewa.gov>; donmarsh@cense.org; Loretta Lopez <llopez@mstarlabs.com>; William Barnes <williambarnesconsulting@gmail.com>  
Subject: Re: Questions to Heidi Bedwell about PSE project in BT

Looping in the others on my email so they can also see Reilly's response.

Barbara

> On Sep 23, 2021, at 8:48 AM, Pittman, Reilly <RPittman@bellevuewa.gov> wrote:

>

> Hi Barbara,

>

> Thank you for providing comments on PSE's application to construct a transmission line in the City of Bellevue. All comments submitted 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.

>

> Your comments included questions about the East Bellevue Community Council (EBCC) which is a community council that exists within the City of Bellevue per state law and has a defined jurisdiction area in east Bellevue. The Energize Eastside project crosses through the EBCC area. The city's Land Use Code requires the public meeting for a project to be held at a session of the EBCC when a project is within their jurisdiction. Notice of any additional public meetings and public hearing will be issued consistent with the requirements in the Land Use Code. Review of this project is underway and there are no meetings or further notices anticipated in 2021.

>

> You can subscribe to alerts and find more information about the permit and process on the City's webpage for the Energize Eastside Project: <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fbellevuewa.gov%2Fcity-government%2Fdepartments%2Fdevelopment%2Fzoning-and-land-use%2Fpublic-notice-and-participation-2&data=04%7C01%7CRPittman%40bellevuewa.gov%7C77f5ddae318b4a47b3b808d9848a1c94%7C222d2edd825545bd859752141b82f713%7C0%7C0%7C637686551140903428%7CUnknown%7CTWFPbGZsb3d8eyJWljoimc4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Iik1haWwiLCJXVCi6Mn0%3D%7C3000&data=1JMLYTUXSIA2MKrBXZGqo1SkQsZVvJDJ5EqDo2S5yOc%3D&reserved=0>.

>

> Again, thank you for taking the time to provide comments and concerns regarding this project.

>

> Reilly Pittman  
> Acting Environmental Planning Manager  
> Development Services Department  
> 425-452-4350  
> rpittman@bellevuewa.gov  
> Pronouns: He/Him/His  
>  
>  
> -----Original Message-----  
> From: Barbara Hughes <barbara\_hughes@hotmail.com>  
> Sent: Tuesday, September 21, 2021 6:59 PM  
> To: Stead, Elizabeth <estead@bellevuewa.gov>  
> Cc: Pittman, Reilly <RPittman@bellevuewa.gov>; Loretta Lopez <llopez@mstarlabs.com>; donmarsh@cense.org;  
William Barnes <williambarnesconsulting@gmail.com>  
> Subject: RE: Questions to Heidi Bedwell about PSE project in BT  
>  
> [EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or  
open suspicious links or attachments.  
>  
>  
> Hello Elizabeth and Reilly,  
>  
> I am writing to remind you that it is now almost four months since I wrote my original emailed letter to you, and two  
months since I resent it to Reilly as requested. I'm therefore requesting your response to my letter,  
>  
> Best,  
>  
> Barbara Hughes  
> 13709 NE 48th Pl, 98005  
>  
> -----Original Message-----  
> From: Barbara Hughes  
> Sent: Tuesday, July 20, 2021 3:26 PM  
> To: Stead, Elizabeth <estead@bellevuewa.gov>  
> Cc: Pittman, Reilly <RPittman@bellevuewa.gov>; Loretta Lopez <llopez@mstarlabs.com>; donmarsh@cense.org;  
William Barnes <williambarnesconsulting@gmail.com>  
> Subject: RE: Questions to Heidi Bedwell about PSE project in BT  
>  
> Here you go - please let me know if you can't open it ok.  
>  
> I have copied Loretta Lopez (Bridle Trails Community Club), Don Marsh (CENSE) and William Barnes (President,  
Brentwood Lane HOA - the HOA for NE 48th Pl.) also, so they remain up to date.  
>  
> Many thanks for getting on top of this Liz, and welcome to Reilly,  
>  
> Barbara Hughes  
> 13709 NE 48th Pl  
>  
> 425-443 9257  
>  
> -----Original Message-----  
> From: Stead, Elizabeth <estead@bellevuewa.gov>

> Sent: Tuesday, July 20, 2021 10:16 AM  
> To: Barbara Hughes <barbara\_hughes@hotmail.com>  
> Cc: Pittman, Reilly <RPittman@bellevuewa.gov>  
> Subject: RE: Questions to Heidi Bedwell about PSE project in BT  
>  
> Ms. Hughes,  
>  
> Would you be able to re-send your communication so I can make sure it gets to the top of the list? We may not be able to answer all of your questions at this time, but I would like to confirm our receipt and make sure the letter is added to the file. Mr. Reilly Pittman is the planner that has taken over for Ms. Bedwell. I have cc'd him on this email, please respond all to this email with your letter.  
>  
> Thank-you,  
>  
>  
> Liz Stead, LEED AP  
> Land Use Director  
> Development Services Department  
> City of Bellevue  
> 425.452.2725, estead@bellevuewa.gov  
>  
> How are we doing?  
>  
> \*New!\* Visit our Virtual Permit Center to schedule a one-on-one virtual appointment with review staff for general permitting questions.  
>  
>  
>  
>  
> -----Original Message-----  
> From: Barbara Hughes <barbara\_hughes@hotmail.com>  
> Sent: Monday, July 19, 2021 8:10 AM  
> To: Loretta Lopez <llopez@mstarlabs.com>  
> Cc: Stead, Elizabeth <estead@bellevuewa.gov>  
> Subject: Re: Questions to Heidi Bedwell about PSE project in BT  
>  
> [EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.  
>  
>  
> Thank you for letting me know this, Loretta.  
>  
> No, I did not get a reply to my emailed letter dated 6/2/21.  
>  
> Liz - I hope you can pick up on this and get me a reply to my questions, thank you!  
>  
> Barbara Hughes  
> 13709 NE 48th Pl  
> 98005  
>  
>> On Jul 19, 2021, at 8:01 AM, Loretta Lopez <llopez@mstarlabs.com> wrote:  
>>

>>  
>> Hi Barbara,  
>>  
>> You sent a message to Heidi Bedwell with a list of questions about the PSE transmission line in Bridle Trails.  
>>  
>> FYI-  
>> Heidi is no longer working for the City of Bellevue. I don't know if Heidi answered your questions before she left the City.  
>>  
>> I have included Liz Stead in this email since Liz is supervising the project.  
>>  
>> Loretta  
>> M 425 443 9012  
>>  
>>

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Thursday, July 15, 2021 8:34 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: POWER LINES OR SOLAR PANELS

Chair Hummer and EBCC members,

I am forwarding written communication from Gerald Hughes regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Hughes or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

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City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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

From: Gerald Hughes <[ghughes@isomedia.com](mailto:ghughes@isomedia.com)>  
Sent: Monday, July 12, 2021 11:45 AM  
To: EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)>; Janice Zahn <[janiczahn8@gmail.com](mailto:janiczahn8@gmail.com)>; Jared Nieuwenhuis <[jnieuwenhuis@comcast.net](mailto:jnieuwenhuis@comcast.net)>; Lynne Robinson <[LynneRpt@live.com](mailto:LynneRpt@live.com)>; Jeremy Barksdale <[jeremybarksdale@gmail.com](mailto:jeremybarksdale@gmail.com)>; Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
Subject: POWER LINES OR SOLAR PANELS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

It might be worth listening to CENSE and Don Marsh.

[https://replica.seattletimes.com/popovers/dynamic\\_article\\_popover.aspx?artguid=45da1a9e-7b30-4f1f-aba4-25e0f525a19a](https://replica.seattletimes.com/popovers/dynamic_article_popover.aspx?artguid=45da1a9e-7b30-4f1f-aba4-25e0f525a19a)

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Thursday, July 15, 2021 8:35 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: POWER LINES OR SOLAR PANELS

Chair Hummer and EBCC members,

I am forwarding written communication from Don Marsh regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Marsh or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

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City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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

From: Don Marsh <[don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com)>  
Sent: Monday, July 12, 2021 1:31 PM  
To: Gerald Hughes <[ghughes@isomedia.com](mailto:ghughes@isomedia.com)>  
Cc: EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)>; Janice Zahn <[janiczahn8@gmail.com](mailto:janiczahn8@gmail.com)>; Jared Nieuwenhuis <[jnieuwenhuis@comcast.net](mailto:jnieuwenhuis@comcast.net)>; Lynne Robinson <[lynnrpt@live.com](mailto:lynnrpt@live.com)>; Jeremy Barksdale <[jeremybarksdale@gmail.com](mailto:jeremybarksdale@gmail.com)>  
Subject: Re: POWER LINES OR SOLAR PANELS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Gerry,

There is one big difference between the transmission lines mentioned in this article and the project proposed in our area. The power lines endorsed by the president would connect cities to big solar and wind farms. However, our power lines would not provide greater access to renewable energy sources.

Our power line project would address a reliability scenario that has never happened and is unlikely to occur in the future. Not one of the tens of thousands of customers who lost power during the recent heat emergency would have kept their power if the project had been built.

On the other hand, solar panels and batteries could address many reliability issues, reducing outages and providing environmental benefits for less total cost to customers.

If there is a national debate between these technologies, it is a no-brainer for Bellevue and the Eastside.

Don



On Jul 12, 2021, at 2:45 PM, Gerald Hughes <ghughes@isomedia.com> wrote:

It might be worth listening to CENSE and Don Marsh.

[https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Freplica.seattletimes.com%2Fpopovers%2Fdynamic\\_article\\_popover.aspx%3Fartguid%3D45da1a9e-7b30-4f1f-aba4-25e0f525a19a&data=04%7C01%7C%7C801efc3be5914d33ec6608d9456533ed%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C637617123231141542%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLjBjBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=pO4E0HnMcPCmLCZXPm%2Bwjdo73tACY6ZwzbPfdOzJYdM%3D&reserved=0](https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Freplica.seattletimes.com%2Fpopovers%2Fdynamic_article_popover.aspx%3Fartguid%3D45da1a9e-7b30-4f1f-aba4-25e0f525a19a&data=04%7C01%7C%7C801efc3be5914d33ec6608d9456533ed%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C637617123231141542%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLjBjBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=pO4E0HnMcPCmLCZXPm%2Bwjdo73tACY6ZwzbPfdOzJYdM%3D&reserved=0)

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Thursday, July 15, 2021 8:36 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: Oh the irony...

Chair Hummer and EBCC members,

I am forwarding written communication from Gerald Hughes regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Hughes or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

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**From:** Gerald Hughes <[ghughes@isomedia.com](mailto:ghughes@isomedia.com)>  
**Sent:** Wednesday, July 14, 2021 10:55 AM  
**To:** EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)>; Janice Zahn <[janicezahn8@gmail.com](mailto:janicezahn8@gmail.com)>; Jared Nieuwenhuis <[jnieuwwenhuis@comcast.net](mailto:jnieuwwenhuis@comcast.net)>  
**Subject:** Oh the irony...

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

**Subject: Oh the irony...**

Bellevue just received an award for using data to drive policy.

<https://bellevuewa.gov/city-news/what-works-certification>

In 2019, the City rejected CENSE's request to remand the Energize Eastside decision back to the Hearing Examiner to ask PSE for data documenting demand for electricity on the Eastside and Bellevue during the past decade.

Unfortunately, data was not relevant for a project that would cost ratepayers over \$200 million.

Is data only important for smaller decisions then?

Don

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Monday, July 12, 2021 11:50 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Pittman, Reilly  
**Subject:** FW: Incorrect application of quasi-judicial restrictions

Chair Hummer and EBCC members,

I am forwarding written communication from Don Marsh regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Reilly Pittman for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Marsh or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

---

**From:** donmarsh@cense.org <donmarsh@cense.org>  
**Sent:** Thursday, July 08, 2021 11:16 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Incorrect application of quasi-judicial restrictions

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear council members,

During the East Bellevue Community Council meeting of July 6, 2021, I was prevented from making a public comment regarding PSE's "Energize Eastside" project. I was told that any such comment would violate "quasi-judicial" restrictions pertaining to such communications. (For your information, the comment is included at the end of this email.)

I believe this restriction violates the highlighted section of RCW 42.36.060:

**RCW 42.36.060**

***Quasi-judicial proceedings—Ex parte communications prohibited, exceptions.***

*During the pendency of any quasi-judicial proceeding, no member of a decision-making body may engage in ex parte communications with opponents or proponents with respect to the proposal which is the subject of the proceeding unless that person:*

- (1) Places on the record the substance of any written or oral ex parte communications concerning the decision of action; and*
- (2) Provides that a public announcement of the content of the communication and of the parties' rights to rebut the substance of the communication shall be made at each hearing where action is considered or taken on the subject to which the communication related. This prohibition does not preclude a member of a decision-making body from seeking in a public hearing specific information or data from such parties relative to the decision if both the request and the results are a part of the record. Nor does such prohibition preclude correspondence*

*between a citizen and his or her elected official if any such correspondence is made a part of the record when it pertains to the subject matter of a quasi-judicial proceeding.*

I believe that “correspondence” in this statute encompasses emails to council members and oral comments presented during the open communication portion of a community council meeting. I expected my comment to be included in the public record. As an executive of a nonprofit organization that represents many Lake Hills residents, I believe it is appropriate for me to speak on their behalf.

Because all members of the EBCC are on the ballot this year, they can publicly discuss and express opinions about Energize Eastside (or any other quasi-judicial matter):

**RCW 42.36.040**

**Public discussion by candidate for public office.**

*Prior to declaring as a candidate for public office or while campaigning for public office as defined by RCW 42.17A.005 no public discussion or expression of an opinion by a person subsequently elected to a public office, on any pending or proposed quasi-judicial actions, shall be a violation of the appearance of fairness doctrine.*

It is common sense that a candidate who engages in “public discussion” is allowed to hear the public’s side of the discussion. According to this statute, the public must be allowed to provide information and ask questions of the candidates. Any other interpretation would lead to ridiculous conclusions.

At future meetings, members of the public must be allowed to ask questions and receive answers from EBCC members regarding Energize Eastside. To partially remedy the mistake that was made earlier this week, I ask council members to read the comment below that I should have been allowed to communicate during Tuesday’s meeting.

Sincerely,

Don Marsh  
President, CENSE.org

## Comment for EBCC meeting, July 6, 2021

My name is Don Marsh, speaking on behalf of CENSE, the Coalition of Eastside Neighborhoods for Sensible Energy.

Since the last EBCC meeting, our city endured temperatures well over 100 degrees for three days in a row, thought to be a once-in-a-thousand-year scenario. This was an extreme test of the reliability of our electric grid. So how did we do?

On one hand, even though peak demand for electricity hit unprecedented levels, PSE did not need to implement rolling blackouts to protect the integrity of the Eastside grid. Rolling blackouts have not been necessary at any time since 2017, when PSE predicted such blackouts might be needed. Some might conclude that the existing grid is adequate to serve our needs.

On the other hand, there are many opportunities for improvement. During those three days, there were hundreds of unplanned outages throughout PSE’s service territory, impacting tens of thousands of customers. Most of these outages could have been prevented if PSE had been investing in a modernized grid.

A modernized grid would incorporate solar panels, batteries, energy efficiency, and coordination of these resources using smart technology known as a Virtual Power Plant. Cities like Portland are already running large pilot programs to refine this approach. By redirecting Energize Eastside funds to create a Virtual Power Plant, all PSE customers would benefit.

But PSE’s Energize Eastside team isn’t likely to mention the many benefits of an Eastside Virtual Power Plant. First, it would provide better year-round reliability than Energize Eastside, which would only serve our community in a theoretical scenario that may never happen. Second, a Virtual Power Plant would offer improved resiliency and faster

recovery from a big natural disaster like an earthquake or a powerful windstorm. Third, a Virtual Power Plant would result in lower electric bills for all PSE ratepayers. And finally, it would reduce greenhouse gas emissions by preserving thousands of trees and reducing the amount of fossil fuels burned to generate electricity.

PSE filed its application to build the North Segment of Energize Eastside in 2021, but the company did not evaluate the feasibility of a Virtual Power Plant as a less expensive, more effective alternative. PSE previously studied the feasibility of batteries, just one part of a Virtual Power Plant, but that analysis is now obsolete and inaccurate. Bellevue's land use code requires a fair evaluation of alternatives. If PSE doesn't provide a thorough and transparent assessment of a Virtual Power Plant as an alternative solution, EBCC would be well justified in rejecting PSE's permit to build Energize Eastside.

## **Pittman, Reilly**

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**From:** Roberts, Karin  
**Sent:** Wednesday, July 7, 2021 9:25 AM  
**To:** Pittman, Reilly; Stead, Elizabeth  
**Subject:** June 1 EBCC Minutes  
**Attachments:** 0601 2021\_EBCC mins.pdf

Hi Reilly & Liz,

I have attached the minutes from the June 1 EBCC meeting. Please add these to the record for the Energize Eastside north segment. Please let me know if you need anything else. Thanks so much for everything last night.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

**East Bellevue Community Council**  
Summary Minutes of Regular Meeting

June 1, 2021  
6:30 p.m.

Virtual Meeting  
Bellevue, Washington

PRESENT: Chair Hummer, Vice Chair Epstein, Alternate Vice Chair Dhananjaya,  
Councilmember Gooding and Councilmember Kasner

ABSENT: None.

STAFF: Chad Barnes, Assistant City Attorney  
Carol Orr, Land Use Planner  
Heidi Bedwell, Environmental Planning Manager

1. **CALL TO ORDER**

The meeting was called to order at 6:31 p.m.

2. **EXECUTIVE SESSION**

Chair Hummer announced recess to Executive Session for approximately 30 minutes to discuss one item of potential litigation.

At 7:03 p.m., Chair Hummer announced that the Executive Session would continue for approximately 20 minutes.

The meeting resumed at 7:31 p.m.

3. **ROLL CALL/FLAG SALUTE**

Deputy City Clerk Karin Roberts called the roll. All Councilmembers were present. Councilmember Dhananjaya led the flag salute.

4. **APPROVAL OF AGENDA**

Councilmember Gooding moved to amend the agenda to add under Agenda Item 9, Resolutions, a motion to remand a previous action. The EBCC disapproved Resolution No. 591 during its May 4 meeting, thereby disapproving City Council Ordinance No. 6575. Vice Chair Epstein seconded the motion.

Councilmember Gooding noted the EBCC's interest in remanding the matter to the City Council to request an ordinance that does not exceed the requirements of state law. He said the entire City of Bellevue, including the East Bellevue Community Council jurisdiction, must comply with the

state Growth Management Act (GMA). Referring to the minimum parking requirements reflected in Ordinance No. 6575 for certain housing near transit, Councilmember Gooding suggested that the half-mile radius to frequent transit service should be modified to be consistent with the quarter-mile radius reflected in state law.

Councilmember Kasner said he appreciated the EBCC's effort to comply with state law. To complete this process under RCW 35.14, the City must present the EBCC with a new ordinance that reflects the EBCC's desire to restrict the terms of Ordinance No. 6575 to state law requirements. Mr. Kasner thanked everyone for their work on this issue.

Chair Hummer expressed support for reducing the radius of certain housing to frequent transit service from one-half mile to one-quarter mile. She said she was hoping for other changes. However, certain items would violate the new state law.

The motion to approve the agenda as amended carried by a vote of 5-0.

5. **COMMUNICATIONS: WRITTEN AND ORAL:** None.
6. **REPORTS OF CITY COUNCIL, BOARDS, and COMMISSIONS:** None.
7. **REPORT OF THE CHAIR:** None.
8. **PUBLIC/COURTESY HEARINGS**
  - (a) Courtesy Hearing: NE 8<sup>th</sup> Street Partners Rezone

Chair Hummer introduced the courtesy hearing and discussion regarding the NE 8<sup>th</sup> Street Partners rezone application. She recalled that the EBCC was established to address certain land use decisions within its jurisdiction when the area was originally annexed by the City of Bellevue.

Chad Barnes, Assistant City Attorney, noted that this is a quasi-judicial matter for the EBCC. He said the appearance of fairness doctrine is intended to ensure that strict procedural requirements are followed to provide a fair and transparent process and decision. He suggested that EBCC members disclose any conflicts of interest or ex parte communications regarding the rezone application. Ex parte communications are contacts with proponents or opponents of the proposed rezone.

Mr. Barnes suggested that Chair Hummer ask council members to comment about whether they have any known conflicts of interest or ex parte communications. If an ex parte communication is disclosed, the council member should identify the name of the person involved in the communication, as well as the date and the substance of the communication.

Responding to Chair Hummer, Vice Chair Epstein said he had no conflicts of interest and no ex parte contacts.



Councilmember Dhananjaya said he had no conflicts of interest and no ex parte communications.

Councilmember Gooding said he had no conflicts of interest and no ex parte communications.

Councilmember Kasner said he had no conflicts of interest and no ex parte communications.

Chair Hummer said she had no conflicts of interest and no ex parte communications.

Carol Orr, Land Use Planner, Development Services Department (DSD), described the NE 8<sup>th</sup> Street Partners Rezone proposal for property located at 13635 and 13655 NE 8<sup>th</sup> Street in the northwest corner of the EBCC jurisdiction. The sites are currently zoned Office (O) and are surrounded by multifamily development.

The rezone follows the approval by the EBCC of the related Comprehensive Plan Amendment (CPA) on January 5, 2021 through the adoption of Resolution No. 584. A rezone request is a quasi-judicial Process III land use application as described in Land Use Code 20.35.320. Staff will evaluate the proposal and prepare a recommendation for consideration by the Hearing Examiner. Ms. Orr said that public notification of the project included two signs on the property, the City's May 20 weekly permit bulletin, and legal noticing in The Seattle Times. The Hearing Examiner will conduct a public hearing and issue a recommendation to the City Council, which will issue the final decision on the rezone. The EBCC will be asked to take action on the rezone following the City Council's decision.

Ms. Orr said staff is beginning to review the rezone application. The purpose of the courtesy hearing is to collect public comment that will be added to the project file for consideration during the review process. The decision of the City Council will not go into effect in the EBCC jurisdiction until the EBCC takes action.

Councilmember Dhananjaya moved to open the courtesy hearing. Councilmember Gooding seconded the motion, which carried by a vote of 5-0.

No one came forward to comment.

Vice Chair Epstein moved to close the courtesy hearing. Councilmember Gooding seconded the motion, which carried by a vote of 5-0.

Jessica Roe, a land use attorney representing NE 8<sup>th</sup> Street Partners, noted that the applicant was unable to attend the meeting this evening. She thanked EBCC members for their support of the CPA related to the property on NE 8<sup>th</sup> Street near 140<sup>th</sup> Avenue NE. The CPA approved a map designation of Multifamily-High (MF-H) to allow for residential development on the site.

Harold Moniz, representing Collins Woerman, said the rezone proposal complies with the adopted CPA. He said the current Office-zoned property is surrounded by residential development and the new project will provide additional housing.

Responding to Chair Hummer, Mr. Barnes suggested asking whether anyone in the audience had comments or questions based on the comments of the applicant's representatives. No one came forward to speak.

Responding to Chair Hummer, Ms. Orr said that anyone wishing to review the public record on the rezone application may contact her or may send an email to [dsRecords@bellevuewa.gov](mailto:dsRecords@bellevuewa.gov) with a reference to File No. 21-104902-LQ.

Councilmember Kasner said he supported the CPA and he looks forward to the future project.

Ms. Hummer noted that the EBCC will hold a public hearing and take action on the rezone application at a future meeting.

Chair Hummer wondered whether the property owners in the area of the rezone site could work together to provide pedestrian access between their properties and NE 8<sup>th</sup> Street.

(b) Courtesy Hearing: Energize Eastside North Segment

Chair Hummer introduced the hearing and discussion regarding Puget Sound Energy's Energize Eastside North Segment project.

At 8:07 p.m., Councilmember Kasner moved to extend the meeting to 9:30 p.m. The motion was seconded by Vice Chair Epstein and carried by a vote of 5-0.

Mr. Barnes reminded the EBCC and the public that this project is a quasi-judicial matter, which implicates the appearance of fairness doctrine. He suggested that EBCC members disclose whether they have any known conflicts of interest and/or have had any ex parte communications regarding the project.

Councilmember Kasner said he has no conflict of interest and has had no ex parte contacts with proponents or opponents of the project.

Councilmember Dhananjaya said he has no conflict of interest related to the project. He noted, however, that a flier with information regarding the project was left at his doorstep. Mr. Barnes said that would not typically be considered an ex parte communication. However, he suggested that Mr. Dhananjaya provide the communication to staff if he still has it.

Councilmember Gooding said he had no conflicts of interest and no ex parte communications.

Vice Chair Epstein said he had no conflicts of interest and no ex parte communications.

Chair Hummer said she had no conflicts of interest and no ex parte communications with proponents or opponents of the Energize Eastside permit application.

Heidi Bedwell, Environmental Planning Manager, said she is the land use project manager for the permit applications submitted by PSE for the construction of their transmission lines. The

Energize Eastside project proposes to replace existing 115 kV transmissions lines with 230 kV lines between Renton and Redmond. The project includes a new Richards Creek substation in Bellevue, and PSE is proposing to apply for permits to construct the project in two phases. The first phase in south Bellevue upgrades 3.3 miles of existing lines between the Lakeside Substation and the southern city boundary. Land use permits for the South Segment have been approved and construction of the substation has begun. Construction permits for the South Segment transmission line are anticipated to be approved this summer.

Ms. Bedwell said the North Segment replaces approximately 5.2 miles of existing transmission lines from the Lakeside Substation to the northern city limits of Bellevue. The project will replace wooden H-frame poles with steel monopoles ranging from 77 feet to 121 feet high. The existing wooden poles range in height from 54 feet to 79 feet. The transmission line passes through the west side of the EBCC jurisdiction.

The proposed North Segment project requires the approval of two land use permit applications: 1) Conditional Use Permit (CUP), Process III, File No. 21-104991-LB, and 2) Critical Areas Land Use Permit, Process II, File No. 21-104989-LO. The CUP is required for new or expanding electrical utility facilities proposed on sensitive sites. The critical areas permit is necessary because the project will impact critical areas and their associated buffers and structure setbacks.

Ms. Bedwell said the notice of application has been received for both permits and tonight is the first required public meeting. Staff has been reviewing the application materials. Prior to the issuance of the Director's decision on the critical areas permit and the Director's recommendation on the CUP, the City will hold another informational public meeting. Ms. Bedwell recalled that the Final Environmental Impact Statement (FEIS) was released in March 2018. The EIS is not a decision document but is intended to identify and disclose the potential environmental impacts of PSE's proposal and to provide recommendations for mitigation measures.

The CUP application results in a Process III, quasi-judicial decision by the City Council. The Director will prepare a recommendation for the Hearing Examiner. The Hearing Examiner will hold a public hearing and make a recommendation to the City Council regarding the permit application. After the City Council adopts an ordinance, the EBCC will vote to approve or disapprove the ordinance. The decision of the EBCC may be appealed to King County Superior Court. For the critical areas permit application (Process II), the Director issues the decision and the decision is appealable to the Hearing Examiner and to the Superior Court.

Ms. Bedwell said the proposal also triggers the need for a critical areas permit because a portion of the proposal will impact critical areas. A critical areas land use permit is a Process II decision made by the Director, concurrently with the Director's recommendation on the CUP. The Director's decision may be appealed to the Hearing Examiner, who adjudicates the appeal. The Hearing Examiner's decision may be appealed to the Superior Court.

Ms. Bedwell said the Land Use Code (LUC) contains regulations regarding electrical facilities general standards [LUC 20.20.255]. Specific information must be addressed as part of the CUP application, including an alternative siting analysis (ASA). The code section contains specific

decision criteria and design standards for electrical utilities facilities. The proposal must comply with the CUP criteria found in LUC 20.30B and with critical areas permit decision criteria found in LUC 20.25H and 20.30P. The recommendations of the Director and the Hearing Examiner are to be based on the applicable LUC criteria.

Ms. Bedwell noted that public meetings have been held to comply with Process III requirements. The public may submit written comments to the Director at any point prior to the public hearing. Additionally, the members of the public may submit written comments or make oral comments during the Hearing Examiner's public hearing. Ms. Bedwell offered tips for effective public comment including putting comments in writing, providing additional site or context information, considering whether the proposal meets the decision criteria, and suggesting appropriate mitigation. She encouraged those providing public comment to be as specific as possible and to consider the LUC decision criteria. Staff is in the early stages of permit review and there will be another informational public meeting before the Director's report is prepared for the Hearing Examiner.

Moving on, Renee Zimmerman, Local Government and Community Engagement Manager for PSE, noted that Sara Leverette, PSE legal counsel, was also attending the meeting. Ms. Zimmerman provided an overview of the Energize Eastside project. She described the need for the project to support Bellevue's continued growth. The project must meet specific federal requirements and PSE has the responsibility to provide safe and reliable power at a reasonable cost for customers. The Energize Eastside project helps PSE in continuing to meet that responsibility.

The existing transmission corridor was established in the late 1920s and early 1930s. The last major update to the backbone of the Eastside's transmission was in the 1960s. Ms. Zimmerman said the current electrical infrastructure is nearing its capacity. She said the Energize Eastside project meets Bellevue's energy needs, as well as federal requirements, and it is the most cost-effective and reliable solution to PSE's transmission capacity deficiency.

Ms. Zimmerman described the three components of PSE's solution: 1) a new substation to provide additional capacity, 2) upgraded transmission lines in the existing utilities corridor to deliver power to homes and businesses, and 3) continued aggressive energy conservation. After nearly four years of study and extensive dialogue communities, PSE selected the Eastside corridor as the final route for the Energize Eastside project. PSE will rebuild approximately 16 miles of existing transmission lines to replace 115 kV lines with 230 kV lines and will build a new substation in central Bellevue next to the current Lakeside substation. For the overall Energize Eastside project, every four poles will be replaced with one or two poles. She said there will be more trees than now when the project is fully completed.

Ms. Zimmerman said that federal reliability standards require that PSE proactively plan their system to determine whether there are vulnerabilities that could compromise reliability. These mandatory standards prevent future large-scale blackouts and help ensure community health and safety. Ms. Zimmerman said PSE's current Eastside system is strained today under peak conditions. She said PSE has complex corrective action plans in place to protect the integrity of

the grid and, ultimately, the reliability of service to customers. Ms. Zimmerman said the current electrical system on the Eastside is becoming increasingly vulnerable to power outages.

Ms. Zimmerman provided background information regarding the planning process for the Energize Eastside project. She recalled that in 2019, the City issued CUPs to PSE for the South Bellevue Segment of the Energize Eastside project. She described the alignment of and facilities included in the North Segment project. She said the project reduces the number of poles from 87 to 41.

Ms. Zimmerman said the current utilities corridor intersects the East Bellevue Community Council jurisdiction for approximately 1.2 miles. PSE's existing corridor borders the western edge of the EBCC boundary. The number of poles along the 1.2 miles of transmission line through the EBCC jurisdiction is reduced from 42 to 10 poles. Ms. Zimmerman presented photo simulations of the project area. She said the number of trees to be removed has been vastly overstated within the community. She said approximately 430 regulated trees along the North Segment will be removed to meet safety clearances, and 40 of those are in the EBCC jurisdiction. She said PSE's goal is to have more trees than currently exist upon project completion.

Ms. Zimmerman described PSE's plans and regulations related to the co-located Olympic pipeline. She said safety is a top priority for PSE in its design, construction and operations. She said that PSE's power lines have safely shared the utilities corridor with the Olympic pipeline for more than 50 years. She said PSE's close coordination with the pipeline operator has ensured the mutual safety of the infrastructure and neighbors along the corridor. She noted that pipeline safety was studied in the EIS.

Chad Barnes, Assistant City Attorney, said the EBCC's rules indicate that the number of speakers should not be limited at a public courtesy hearing. He said the rules allow the EBCC to continue a meeting to a specific time and place by a majority vote.

Chair Hummer said the EBCC has been involved in other quasi-judicial matters in which the EBCC's input was not taken into consideration. She said she was frustrated that the EBCC did not receive information regarding this topic earlier in the year.

Councilmember Kasner moved to open the courtesy hearing. Vice Chair Epstein seconded the motion, which carried by a vote of 5-0.

1. Don Marsh, President of the Coalition of Eastside Neighborhoods for Sensible Energy (CENSE), said the organization was established seven years ago in response to the threat posed by PSE's Energize Eastside project. He focused on three key questions: 1) Is the Energize Eastside project needed?, 2) Is the project safe?, and 3) Why is PSE constructing this project? He suggested that the electrical capacity studies related to the Energize Eastside project were based on an unrealistic, extreme scenario. Mr. Marsh said the project is based on a forecast from PSE's 2013 integrated resource plan. In 2026, PSE's demand is expected to exceed a system-wide overload level set by the unlikely coincidence of the crises referenced in the previous scenario.

Mr. Marsh said the Washington Utilities and Transportation Commission (WUTC) has criticized PSE for years regarding the company's practice of producing wildly aggressive and inaccurate demand forecasts. He said PSE cannot predict conservation levels beyond a 10-year horizon. Mr. Marsh highlighted data reported by PSE to the Federal Energy Regulatory Commission (FERC). He said that peak demand for electrical power has been declining slightly every year over the past decade due to conservation efforts, better technology and warmer winters. He said that peak demand is the central issue related to the Energize Eastside project. Mr. Marsh said PSE has not disclosed data that proves the need for the project.

Mr. Marsh commented regarding safety concerns. He suggested that the existing utilities corridor is not wide enough to accommodate the new higher-voltage transmission lines. He expressed concern regarding the colocation of two 50-year-old petroleum pipelines. He recalled the explosion related to the pipeline near Bellingham several years ago. He said the pipeline is 10 times closer to Tyee Middle School than California safety regulations would allow. He expressed concern regarding the potential for fires caused by a mishap with the pipeline.

Mr. Marsh said the Energize Eastside project has already cost PSE \$90 million. The total cost of the project is likely to exceed \$200 million. He said PSE receives a 10-percent return on investment for infrastructure projects, which it collects from customers through higher electric bills. He said PSE could collect approximately \$20 million annually for the lifetime of the project, or a minimum of 50 years, with a total cost to customers exceeding \$1 billion. Mr. Marsh said PSE's revenues have declined 48 percent since 2009. He said a copy of the report shared with the EBCC is available online at [www.CENSE.org/Bellevue](http://www.CENSE.org/Bellevue).

2. Richard Aramburu, legal counsel for CENSE since 2015, commented on how to apply the facts and factors described by Mr. Marsh in making the EBCC's decision. He said Bellevue's code for electrical facilities requires that PSE demonstrate that there is an operational need for the facility. He said the code has a location selection hierarchy for electrical facilities in Bellevue, which favors commercial areas over residential areas. He said there is also a requirement in the code that the City consider a range of technologies (e.g., solar energy, battery facilities) for electrical power. Mr. Aramburu asserted that the Bellevue City Council did not trust PSE to make these decisions. Rather, the City indicated that there must be a showing of work for need, reliability, location and technology.

Mr. Aramburu expressed concern that PSE split the Energize Eastside project into separate components (i.e., North and South segments). He said the North Segment project must be considered under the 2021-2022 standards criteria and forecast and not based on the 2013 forecast. He noted his May 27 letter to the EBCC to provide written comments. He said the City of Seattle reports that energy efficiency is offsetting economic growth in terms of the demand for electrical capacity. He said that PSE indicated to the WUTC in July 2020 that its July 2020 forecast reflected a significantly lower peak load capacity need than the previous forecast. PSE also stated that the peak load forecast does not project a material capacity need for the next five years.

3. Warren Halverson, a Bridle Trails resident, expressed frustration that the issues and concerns related to the Energize Eastside project have not been resolved over the past few years.

He said the project is the most costly and environmentally destructive solution with perhaps the greatest risk to public safety of any previous project. He questioned the need for the project, noting that the stated need is based on data that has not been updated for several years. He asked for data-driven evidence that the Energize Eastside project will improve local electrical reliability. He expressed concern about the potential danger of constructing the project along the oil pipeline alignment. Mr. Halverson expressed concern about the removal of trees to accommodate the project as well as other environmental impacts. He asked EBCC members to listen carefully and to pursue current information. He asked the City to provide separate but similar informational meetings in the north 4.2 miles of the utilities corridor in Bellevue.

4. Barbara Braun said she has lived in Bellevue for 16 years and is involved in several community organizations including 300 Trees. She said the City must stop the removal of trees. She noted the City's goal to achieve a 40-percent tree canopy. She said the community must plant 75,000 trees through 2050 to achieve that goal. She said PSE removed approximately 300 trees in 2020 for the 148<sup>th</sup> Avenue project, and the trees have not yet been replaced. The Energize Eastside project will remove 143 trees from north Bellevue. She said PSE plans to replace the significant trees, and 89 percent of the significant trees are on private property. She said there is no guarantee that trees lost in East Bellevue will be replaced in East Bellevue. She expressed concern regarding the cost of the Energize Eastside project. She said the project provides no benefits to Bellevue residents and businesses and no path to clean energy. She said greenhouse gas emissions must be reduced by 50 percent by 2030. She asked the EBCC to deny the project permits. She said CENSE submitted a petition that included 131 signatures by Lake Hills residents.

5. Court Olson said he lives within the EBCC jurisdiction. He noted that he sent a three-page letter to the EBCC the previous Thursday. He said he has an engineering background and has been overseeing the design and construction of commercial buildings over the past four decades. He said buildings are the source of 80 percent of the demand on the electrical grid. He said he has been attending annual PSE integrated resource planning meetings as a technical advisor for a number of years. He said PSE frequently overestimates its future energy demand. He said the demand has been relatively flat over the past 10 years, due largely to increased energy efficiency in buildings. He said PSE has not demonstrated the need for the Energize Eastside project.

Barbara Braun indicated that Barbara Chevalier had signed up to speak but was not able to participate tonight. She noted that Ms. Chevalier requested a second date to make her comments.

6. Suzanne Meston, speaking on behalf of the Bridle Trails area's Trails and Maintenance Association, asked the City to provide a separate public meeting for the North Segment project. She said she received a mailed notification announcing that a public hearing would be held as part of the EBCC's June 1 meeting. She said the notification indicated that PSE would present current data regarding the project and the EBCC would hear public comment. Ms. Meston expressed concern that residents were not given adequate notice regarding tonight's meeting. She said the mailer did not provide instructions for participating in the EBCC meeting. Ms. Meston noted her understanding that the City Council, and not the EBCC, has the final decision-making authority over land use decisions in Bridle Trails. She said the mailer does not indicate whether

this is the only opportunity for information and public comment before the City Council makes its decision. Ms. Meston highlighted concerns regarding the need for the project, lack of study regarding alternative solutions, impacts on neighborhood character, public safety, the loss of mature trees, and costs to ratepayers. She asked the EBCC to share residents' concerns with PSE and to request additional information. She asked the City to schedule a public meeting in north Bellevue, with adequate advance notice, to provide a project update.

7. Loretta Lopez, speaking on behalf of the Bridle Trails Community Club, said PSE's plan reflects old approaches to current issues. She said there are new technologies and better solutions for electrical reliability. She said PSE does not respect the character of residential neighborhoods. She said the Land Use Code indicates that residential neighborhoods should not bear the burden of electrical facilities because they are not producing the need for the energy. She said the project will result in a significant loss of trees and vegetation. She expressed skepticism regarding PSE's statement that there will be more trees upon the completion of the project than now. She expressed concern regarding the loss of large, mature trees. Ms. Lopez expressed concern regarding the safety of using steel monopoles next to the Olympic pipeline. She said that Bridle Trails residents have not received an update or been given the opportunity to provide input over the past few years. She said she did not understand why Bridle Trails residents received notification to provide public comment before the EBCC when the neighborhood is not within the EBCC's jurisdiction. She said Bridle Trails residents would like a separate public meeting regarding the North Segment project.

8. Loretta Lopez, speaking as an individual, said she has lived in the Bridle Trails area for 30 years. She expressed concern regarding the notification sent to Bridle Trails residents about the EBCC meeting and hearing. She suggested that the City should have sent the notice earlier with a clear explanation about the EBCC and the hearing process. Ms. Lopez said she raised the issue of a conflict of interest regarding the representation of the EBCC by the City Attorney's Office. She anticipates that the Energize Eastside permit decision will be appealed. She said the EBCC should be represented by outside counsel to avoid a conflict of interest.

At 9:15 p.m., Mr. Barnes suggested that the EBCC make a motion to continue the hearing and meeting beyond 9:30 p.m.

Chair Hummer said the EBCC's rules indicate that the number of speakers should not be limited at a public courtesy hearing. Given that additional persons wish to provide comment, Ms. Hummer suggested that the EBCC consider continuing the remainder of the public courtesy hearing to the next regular EBCC meeting in July.

Vice Chair Epstein moved to continue the public courtesy hearing to the next regular EBCC meeting in July. Councilmember Gooding seconded the motion.

Councilmember Kasner suggested that the announced speaker, Gerald Hughes, should be allowed to speak regardless of the outcome of the motion. He said a number of people have been waiting for two or more hours and they should be allowed to speak tonight. He said he will not support the motion.



Chair Hummer concurred with Councilmember Kasner. She said that Councilmembers have not yet been able to comment and there are additional agenda items.

Councilmember Dhananjaya said he supports allowing participants to speak. He asked whether the EBCC should prioritize speakers based on whether they are EBCC residents.

Deputy City Clerk Karin Roberts said there are approximately 17 more individuals on the list to speak. However, she was not sure if all of them were still participating in the meeting.

Councilmember Gooding said he is in favor of allowing people to speak if they are still connected to the meeting. However, he believes a second meeting is needed and the EBCC will need to make a decision about where to draw the line in the list of individuals wishing to speak tonight.

Vice Chair Epstein concurred with allowing more individuals to speak tonight.

The motion to continue the public courtesy hearing to the EBCC's regular July meeting failed by a vote of 0-5.

Chair Hummer noted the vote and moved forward with the courtesy hearing.

Councilmember Kasner moved to extend the meeting until 10:30 p.m. Councilmember Dhananjaya seconded the motion, which carried by a vote of 5-0.

9. Gerald Hughes thanked the EBCC members for their service and recalled that he served five years on the EBCC. He said the EBCC has jurisdiction over only one-third of a mile of the transmission line. If the EBCC denies the project, the City Council can still approve the project and it will just go on a different route. He said PSE's energy demand forecasts have been inaccurate for decades. He said that years ago, PSE projected the need for 20 nuclear power plants and 10 coal-fired plants in the region. He said PSE's analysis focused unrealistically on a number of crises happening at the same time. Mr. Hughes said he hopes the City Council does not approve the project, but he believes it will.

10. Curtis Allred said he has been a Bellevue resident for 15 years, and he has been following the Energize Eastside project since 2014. He served on PSE's original community advisory group (CAG) and participated in the EIS process. He said he is convinced that the project is not needed based on critical data revealed by CENSE and other sources. He noted PSE's evasive posturing and conflicting marketing materials. He believes that PSE is motivated by financial gains for their shareholders. Mr. Allred said the project is damaging for the community. He said PSE should be implementing modern technologies to improve electrical reliability instead of investing in large, outdated infrastructure projects.

11. Norm Hansen, a Bridle Trails resident, said he has lived in Bellevue for approximately 50 years and he has been working with PSE over the past 25 years, trying to improve electrical reliability in the Bridle Trails area. He served as a technical member of the integrated resource plan committee and as a member of PSE's CAG in 2013 and 2014. He opined that the EBCC

should deny the Energize Eastside North Segment permit. He said the described electrical facility does not meet Bellevue's Land Use Code Chapter 20.20.255 regarding siting alternatives. He raised the issue of equity, noting that the Bridle Trails subarea of residential housing already has six high voltage transmission lines and two substations, with a third substation planned. He said it is time for PSE to consider modern energy solutions.

12. Lori E. expressed concern that the Energize Eastside project is outdated and will cause adverse environmental and neighborhood impacts. She said PSE justifies the need for the project using studies published between 2012 and 2015. She said the data used to forecast peak demand in those studies was even older. She said peak demand for electricity declined over the past decade. She asked the EBCC to insist that PSE provide peak demand data for the substations included in the North Segment project. She noted that she lives in Newcastle.

13. Sue Stronk, also a Newcastle resident, said the utilities right-of-way (ROW) is too narrow to collocate the Energize Eastside project with the two oil pipelines. She said the project is unsafe because the width of the ROW does not meet the industry guideline of 120-150 feet. She said that transmission lines are typically placed in the center of a corridor. However, that cannot be done with the Energize Eastside project due to the oil pipelines. She said PSE states that it will follow Olympic Pipeline Company's safety protocol during construction. However, it is unclear who is responsible for the overall safety of the utility corridor. She asked the EBCC to deny the project permit because it does not meet electric safety code guidelines.

14. Jennifer Keller, a Lake Hills resident, said she has lived in Bellevue for the past 18 years. She encouraged the City to look toward the future and to embrace clean energy, energy efficiency and power storage technologies. She said the data used by PSE to justify the Energize Eastside project is weak and outdated, and the project is not needed. She encouraged PSE to instead invest in smarter technologies, demand management, clean energy and batteries. She noted that she submitted written comments to the EBCC the previous week. She said PSE has been inflating its projected demand for electricity for many years. She said PSE used an unrealistic scenario to rationalize the need for the project.

15. Jeanne DeMund, a Renton resident, said she has been following the Energize Eastside project for seven years. She expressed concern that PSE has not considered alternatives instead of using its outdated, unverified demand forecast. She said alternative power technologies have advanced significantly, and an analysis of alternatives is required by LUC section 20.20.255. She said no analysis has been performed related to the summer peak demand. She said the project permit should be denied.

16. Michiel Worries said he lives in the Glendale area near the proposed Energize Eastside project. He said the Glendale community was not invited to provide feedback in the past, despite its proximity to the project. He said a summary of community input in 2014 is consistent with his concerns. He highlighted concerns about the environmental and aesthetic community impacts. He expressed concern regarding visual impacts and said that the poles are higher than the tree canopy. He suggested that the project will negatively impact property values. He expressed concern regarding the collocation with the Olympic pipeline. He said there is a body of research regarding the effects of high voltage power lines and metal poles in the proximity of a pipeline.

There is an indication that high voltage power lines cause corrosion and lead to defects in pipelines. He said it is unacceptable to double the voltage of the power lines. He summarized his concerns regarding safety, pole height, visual impacts and quality of life. He asked the EBCC to encourage PSE to consider better options.

17. Anne Newcomb said she is a co-lead of the Washington Clean Energy Coalition and a member of the Washington State Sierra Club energy committee. She said the Energize Eastside project will adversely affect many Eastside residents and pose a danger to neighborhoods. She said she has attended most of PSE's 2021 integrated resource plan meetings. She is impressed with the significant reduction in energy demand anticipated over the next 10 years. She encouraged the use of clean energy (i.e., solar, battery storage) to help meet peak demand without the need to build new local transmission lines. She said the cost of solar energy has decreased by 70 percent since 2013, and the cost of battery storage has decreased nearly 80 percent. She said PSE has not factored the costs and efficiency improvements of solar and batteries into its analysis. She said the last study completed by PSE for the Energize Eastside project was in 2015. She said solar energy and battery storage are much better solutions for meeting peak demands and she urged the EBCC to use its power to deny the project and move toward a clean energy future.

18. Karen Esayian recalled that in March 2008, the City Council adopted two ordinances related to PSE's electrical system. Ordinance No. 5802 amended the Utility Element of Bellevue's Comprehensive Plan relating to transmission lines. It states that it is important to ensure that new and expanded electrical facilities are sensitive to neighborhood character. The ordinance included a map highlighting the sensitive sites requiring special review. Ordinance No. 5805 amended the Land Use Code and enacted standards for new or expanded electrical utility facilities, including transmission lines. In August 2015, the City Council adopted Ordinance No. 6251, which updates the Comprehensive Plan and indicates that the City recognized that residents needed additional protection in future land use decisions regarding utility lines. She asked the EBCC to make its decision based on the existing land use codes.

19. Sam Esayian said he has been a Bellevue resident for 45 years. He questioned the wisdom of excavating near the two pipelines to install new electrical facilities. He said the poles and wires were put in place approximately 90 years ago before there were surrounding residential areas. In the late 1960s or early 1970s, the City and PSE agreed to allow the Olympic pipelines in PSE's ROW. Mr. Esayian said PSE's literature does not disclose that the diameter of the poles installed in 2007 was 1.5 feet to 2 feet wide. The poles to be installed with the Energize Eastside project have diameters ranging from 4 feet to 6 feet. He questioned the need for the project and whether it is worth taking a chance on a catastrophic event. He urged the EBCC to deny the project permit.

20. John Ellis said he has lived in Bellevue for 50 years. He said he agrees with much of what has been said tonight. He said the Energize Eastside project is expensive and uses outdated technology to fix a problem that does not exist. He urged the EBCC to deny the permit.

21. Barbara Braun read written comments submitted by Michelle Mentzer. Her comments expressed concern regarding the removal of trees for PSE's projects, including for the Lake Hills

transmission line. She expressed concern about the high voltage lines and the removal of 400 trees. Ms. Mentzer expressed concern regarding the pole height and visual impacts. She encouraged the EBCC to deny the project.

22. Janis Medley said she has lived in Bellevue for 14 years. She said PSE claims that the project is needed to meet the increasing peaks in electrical demand on the Eastside. She said PSE argues that its project is consistent with neighborhood character because transmission lines are already part of the character of areas along the utilities corridor. She said she is not convinced by PSE's position regarding the need for the project or its sensitivity to neighborhood character. She said PSE documents submitted to the WUTC indicate that peak demand is declining throughout its service area. However, PSE claims that peak demand on the Eastside is growing. Ms. Medley said the large poles are inconsistent with neighborhood character. She asked the EBCC to insist that PSE provide data from Eastside substations to verify PSE's claim of an increasing peak demand.

At 10:14 p.m., Councilmember Kasner moved to close the courtesy hearing. The motion was seconded by Vice Chair Epstein and carried by a vote of 5-0.

Chair Hummer suggested continuing the discussion to the regular July meeting. Mr. Barnes confirmed that a meeting may be continued to a specific date and time.

Councilmember Kasner acknowledged that the public comment portion of the courtesy hearing has been closed. However, the item should be continued to allow EBCC discussion during the next meeting.

Councilmember Kasner moved to continue discussion of PSE's Energize Eastside project to the July 6 regular meeting of the East Bellevue Community Council. Councilmember Dhananjaya seconded the motion, which carried by a vote of 4-1 with Councilmember Gooding opposed.

## 9. **RESOLUTIONS**

### (a) Motion to Remand a Previous Action

Kari Sand said she is legal counsel this evening regarding this item.

Councilmember Gooding moved to amend an action previously adopted with regard to Resolution No. 591 approved by the EBCC on May 4, 2021, in order to clarify that the extent of the disapproval is limited to only those provisions in City Council Ordinance No. 6575 that exceed the requirements of the state Growth Management Act (GMA). Councilmember Dhananjaya seconded the motion.

Councilmember Kasner noted that the EBCC cannot amend Resolution No. 591 but is offering a clarification. He said the action of the motion is to raise the possibility of approving a new affordable housing ordinance that complies with the GMA but does not change to a higher standard. He recommended taking action on a new resolution to allow EBCC members to fulfill their duties while complying with state law.

Chair Hummer commented on her opposition to City Council Ordinance No. 6575. She said her intent is to not exceed the minimum requirements established under the state GMA. For example, the half-mile radius to frequent transit service criteria should be limited to the state GMA requirement of a one-quarter mile radius to frequent transit service in East Bellevue.

The motion carried by a vote of 5-0.

Ms. Sand said Councilmember Kasner is correct that an additional resolution is needed to clarify the rationale for the EBCC's decision. She said that item will be included on the July 6 meeting agenda.

10. **NEW BUSINESS**

- (a) Appointments to the EBCC Continuation Pro and Con Argument Committees

Chair Hummer said the EBCC received three applications for the pro argument committee from Jeanne Elliott, Leonard McGhee and Bal Simon.

Councilmember Kasner moved to appoint Jeanne Elliott, Leonard McGhee and Bal Simon to prepare the "for continuation" position statement in the 2021 Voters' Pamphlet. Vice Chair Epstein seconded the motion, which carried by a vote of 5-0.

- (b) Adoption of Voters' Pamphlet Explanatory Statement

Councilmember Kasner moved to adopt the explanatory statement for the 2021 Voters' Pamphlet. Councilmember Dhananjaya seconded the motion, which carried by a vote of 5-0.

11. **CONTINUED COMMUNICATIONS**

Councilmember Kasner said the Lake Hills Neighborhood Association (LHNA) will have a virtual meeting on June 17 to discuss the need for a traffic light at the intersection of Lake Hills Boulevard and 156<sup>th</sup> Avenue SE. He noted that he plans to attend.

Chair Hummer asked EBCC members to let Ms. Roberts know if they plan to attend the meeting.

12. **APPROVAL OF MINUTES**

- (a) Summary Regular Meeting Minutes of May 4, 2021

Councilmember Kasner moved to approve the minutes of the May 4, 2021 Regular Meeting. Councilmember Dhananjaya seconded the motion, which carried by a vote of 5-0.

13. **ADJOURNMENT**

Councilmember Kasner moved to adjourn the meeting. The motion was seconded by Councilmember Dhananjaya and carried by a vote of 5-0.

At 10:34 p.m., Chair Hummer declared the meeting adjourned.

Karin Roberts, CMC  
Deputy City Clerk

/kaw

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Friday, July 2, 2021 9:16 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: PSE's proposed EE North Segment  
**Attachments:** 20210701 to EBCC2.pdf; 20210701 Letter2 to EBCC Att.B.pdf; 20210701 Letter2 to EBCC Att.A.pdf

Chair Hummer and EBCC members,

I am forwarding written communication from Rick Aramburu regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Aramburu or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

---

**From:** Carol Cohoe <Carol@aramburu-eustis.com>  
**Sent:** Thursday, July 01, 2021 4:49 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Cc:** Rick Aramburu <Rick@aramburu-eustis.com>; Hummer, Betsi <BHummer@bellevuewa.gov>; Dhananjaya, Hassan <HDhananjaya@bellevuewa.gov>; swalter@bellevuewa.gov; Gooding, Ross <RGooding@bellevuewa.gov>; Kasner, Steve <SKasner@bellevuewa.gov>  
**Subject:** PSE's proposed EE North Segment

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Please review and make part of the record this comment letter from Mr. Aramburu, filed on behalf of the CENSE organization, including its two attachments.

Carol Cohoe, Legal Assistant  
Law Offices of J. Richard Aramburu, PLLC  
*Please "REPLY ALL" to ensure that Mr. Aramburu also receives your response.*

We are located in the Hoge Building at  
705 Second Avenue, Suite 1300  
Seattle, WA 98104-1797  
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.

# LAW OFFICES OF J. RICHARD ARAMBURU PLLC

705 Second Avenue, Suite 1300  
Seattle, WA 98104-1797  
Telephone 206.625.9515  
Facsimile 206.682.1376

[www.aramburulaw.com](http://www.aramburulaw.com)  
[www.aramburu-eustis.com](http://www.aramburu-eustis.com)

July 1, 2021

East Bellevue Community Council  
c/o Karin Roberts, Deputy City Clerk  
450 - 110th Ave NE  
Bellevue, WA 98004  
By Email to: [EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)

By Email to EBCC Members  
Betsi Hummer, [bhummer@bellevuewa.gov](mailto:bhummer@bellevuewa.gov)  
Hassan Dhananjaya, [hdhananjay@bellevuewa.gov](mailto:hdhananjay@bellevuewa.gov)  
Ron Epstein, [swalter@bellevuewa.gov](mailto:swalter@bellevuewa.gov)  
Ross Gooding, [rgooding@bellevuewa.gov](mailto:rgooding@bellevuewa.gov)  
Steve Kasner, [skasner@bellevuewa.gov](mailto:skasner@bellevuewa.gov)

Re: Puget Sound Energy's "Energize Eastside" proposal, North Segment  
Bellevue Application File No. 20-112645

Dear Community Council Members:

On May 27, 2021, this office provided comments on Puget Sound Energy's Energize Eastside ("EE") transmission proposal on behalf of the Coalition of Eastside Neighbors for Sensible Energy (CENSE), a Washington nonprofit corporation. For the past seven years, CENSE has been intensively involved in the permitting process for the EE project, an eighteen-mile electric transmission proposal through Bellevue and other Eastside communities proposed by Puget Sound Energy (PSE).

CENSE previously filed comments on the PSE application for the "North Segment" of its transmission project, an approximately 5.2 mile portion of the overall Energize Eastside project. The "North Segment" begins at the north side of the Lakeside substation and ends at Bellevue's northern city limit. A portion of this transmission proposal goes through the jurisdictional area of EBCC.

At the close of the meeting on June 1, 2021, the courtesy hearing was extended to the next EBCC meeting, scheduled for July 6, 2021. This comment addresses issues raised during the first courtesy hearing.

DSD 003161



At the June 1, 2021 meeting, Heidi Bedwell of the City of Bellevue addressed permitting issues for the North Segment, including the segment of transmission line within EBCC's jurisdiction. She described the permitting process to be followed during permit review. Ms. Bedwell did not address whether EBCC had jurisdiction over the proposal.

Indeed, jurisdictional issues arose in a prior review of a PSE transmission line proposal. This was a 2.89 mile, 115 kV transmission line connecting two substations: the line would run partially through EBCC's jurisdictional area. Because it ran along 148<sup>th</sup> Avenue N.E., we refer to this line as the "148<sup>th</sup> line."

PSE there, as here, applied for a conditional use permit for the transmission, which was eventually approved by the Bellevue City Council. When the matter came before this Council, it conducted its own hearings and disapproved that portion of the line within its jurisdiction.

PSE appealed the EBCC denial to court. The trial court affirmed this Council's decision and PSE appealed to the Court of Appeals, which concluded that the trial court improperly upheld the EBCC disapproval of the ordinance. *PSE v. EBCC*, No. 74464-0 (Unpublished)(January 30, 2017).

In addition to arguing that the content of the EBCC decision was in error, PSE claimed that EBCC exceeded its authority and thus its decision denying the conditional use permit for the 148<sup>th</sup> line was outside its jurisdiction. Slip Opinion at 19-22 (a copy of this portion of the Court's opinion is Attachment A hereto). As the Court said:

PSE argues, for the first time in its reply brief, that the EBCC "asserts the right to unilaterally affect the reliability of power to Bellevue homeowners outside its territory."

Because PSE had raised this issue for the first time in its reply brief, the court declined to consider it. See Attachment A. However, the Court went on to note that the City had raised a similar issue in its respondent's brief:

It argues that the EBCC's decision, if left standing, would have an extraterritorial affect because it will affect citizens outside the EBCC's area.

The City's actual brief filed with the court is attached to this letter as Attachment B. In its brief, the City claimed that "EBCC's disapproval of this project reaches beyond its jurisdiction, affecting over 12,400 citizens served by the substations at issue." Page 3. The City's brief indicated EBCC's decision did not "address the project as a whole and focus[ed] only on the EBCC's narrow concerns regarding the aesthetics of 148<sup>th</sup> Avenue." *Id.* The City resorted to perjorative characterization of EBCC motives:

Here, by mischaracterizing the nature of 148th Avenue, the EBCC attempts to support its not-in-my-backyard concerns at the expense of the project and the City as a whole.

Brief at 4.

Ultimately, the Court of Appeals declined to rule on the City/PSE claims that the EBCC decision should be reversed on NIMBY grounds:

RCW 35.14.040 provides that the EBCC's disapproval "shall not affect the application of any ordinance or resolution affecting areas outside the community municipal corporation." Because we hold that PSE has met its burden to show that the EBCC's resolution is improper, we need not also decide whether the resolution violates the geographical limitations of this statute. Accordingly, that is an issue left for decision another day.

Slip Opinion at 21 (Emphasis supplied).

As the Council is aware, the current PSE proposal for Energize Eastside also involves a transmission line proposal that will impact areas outside EBCC's jurisdiction. Given the prior position taken by the Bellevue City Attorney's office, the City/PSE will argue again that this Council lacks jurisdiction and hope that the Court will rule on the "issue left for decision another day" in the 148<sup>th</sup> case on EBCC's decision on Energize Eastside.

The failure of the City to be forthright and admit to its objective in representations to this Council is particularly disappointing. Moreover, the City Attorney's office has appointed Chad Barnes as EBCC's lawyer, when Mr. Barnes was the author of the brief claiming a lack of jurisdiction and claiming EBCC acted on NIMBY motivations. This poses a clear conflict of interest. EBCC should insist on unbiased legal representation and outside counsel.<sup>1</sup>

---

<sup>1</sup> We anticipate that the City will claim it has the right to appoint attorneys to represent EBCC without its consent, citing *Sammamish Comm. Mun. Corp. v City of Bellevue*, 107 Wn. App. 686 (2001). However, that case dealt with representation as a general matter; here, the brief drafted by Mr. Barnes presented an actual, material conflict with the interests of EBCC. As described by the Court:

Here, East Bellevue and Sammamish have produced no evidence to indicate the existence of an actual conflict of interest in the City's representation of the community councils in reviewing City zoning ordinances. Instead, the record indicates that the City has provided the community councils with independent representation whenever an actual conflict has appeared imminent.<sup>3</sup>

<sup>3</sup> Over the past ten years, at least five conflicts between the City and the community councils have been litigated. In each instance the City has provided the community councils with outside legal counsel.

(continued...)

July 1, 2021  
Page 4

Thank you for this opportunity to provide comment on this issue. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



J. Richard Aramburu

JRA:cc

cc: CENSE

---

<sup>1</sup>(...continued)

Because the arrangement for legal representation between the City and the community councils has proven acceptable in similar cases involving other public entities, we find the City's representation of the community councils to be consistent with the Rules of Professional Conduct.

107 Wn. App. 693-94.

DSD 003164

# Attachment B

74464-0

74464-0

No. 74464-0-I

COURT OF APPEALS  
OF THE STATE OF WASHINGTON  
DIVISION I

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PUGET SOUND ENERGY, INC.,  
Appellant/Cross-Respondent,

vs.

EAST BELLEVUE COMMUNITY COUNCIL,  
Respondent/Cross-Appellant, and  
CITY OF BELLEVUE,  
Respondents.

FILED  
COURT OF APPEALS  
STATE OF WASHINGTON  
DIVISION I  
2016 MAY 23 PM 4:07

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BRIEF OF RESPONDENT CITY OF BELLEVUE

---

CITY OF BELLEVUE  
OFFICE OF THE CITY ATTORNEY  
Chad R. Barnes, WSBA No. 30480  
Assistant City Attorney  
Attorney for City of Bellevue  
450 – 110th Avenue NE  
Bellevue, WA 98004  
(425) 452-6829

*[Faint signature]*

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## **I. INTRODUCTION**

This matter involves Puget Sound Energy's (PSE) proposal to link the Lake Hills and Phantom Lake electrical substations with an additional 115kV transmission line in order to increase reliability and meet future demands. The project underwent over four years of regulatory permit analysis before being approved by the City of Bellevue (City).<sup>1</sup> However, without consideration of the project as a whole, the East Bellevue Community Council (EBCC) disapproved PSE's conditional use permit focusing exclusively on the EBCC's own parochial concerns. The City requests that the trial court's Order dismissing PSE's LUPA petition be reversed and Resolution No. 550 be vacated.

## **II. ASSIGNMENTS OF ERROR**

The City joins in the assignments of error and legal arguments put forth in Puget Sound Energy Inc's Opening Brief.

## **III. (PSE) STATEMENT OF THE CASE**

The City incorporates PSE's statement of the case.

## **IV. SUMMARY OF ARGUMENT**

The City provides the following brief argument and recitation of the facts from the record to assist the Court in understanding the

---

<sup>1</sup> PSE originally applied for the project in December, 2011. Prior to its application PSE engaged the City for several years regarding siting for the project. Linking the Phantom Lake and Lake Hills substations has been part of PSE's Electrical Facilities Plan since 1993. AR 76, 81.

arguments asserted by PSE and to point out factual errors made by the EBCC.

## V. ARGUMENT

### 148<sup>TH</sup> Avenue is not an “Urban Boulevard”.

The City’s Comprehensive Plan outlines aspirational goals balancing the needs of residential neighborhoods with utilities and a coordinated design esthetic. In this matter, the EBCC’s findings in support of Resolution No. 550 mischaracterize the nature of 148<sup>th</sup> Avenue under the City’s Comprehensive Plan. The EBCC’s finding No. 9 asserts that 148<sup>th</sup> Avenue is an “Urban Boulevard”<sup>2</sup> and thus siting electrical facilities along the route is incompatible with the Comprehensive Plan. AR 3016-3020. Simply put, nothing in the City’s Comprehensive Plan prevents electrical facilities from being sited along 148<sup>th</sup> Avenue. Instead, the City’s Comprehensive Plan provides, in part, that the City will:

Work with Puget Sound Energy to implement the electrical service system servicing Bellevue in such a manner that new and expanded transmission and substation facilities are compatible and consistent with the land use pattern established in the Comprehensive Plan.

UT-72; AR 240.

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<sup>2</sup> Notably, the City’s Comprehensive Plan does not use the term “urban boulevard” nor does it designate 148<sup>th</sup> Avenue as an “urban boulevard.” Instead, the City has an urban boulevard’s initiative, which is a program that explores ways to improve neighborhood livability and character as well as the environment through increased tree canopy, natural drainage practices and enhanced streetscapes. 148<sup>th</sup> Avenue is not part of the urban boulevard initiative.



Additionally, the City's Comprehensive Plan states:

Design, construct, and maintain facilities to minimize their impact on surround neighborhoods.

UT-5; AR 237.

Here, the City undertook a Comprehensive Plan Policy Analysis weighing the competing goals, aspirations and policies within the plan. The City found that the proposed route along 148<sup>th</sup> Avenue with over \$856,740.00<sup>3</sup> pledged by PSE toward environmental mitigation and restoration work was compatible with the Comprehensive Plan. By running the proposed transmission lines down a major arterial (148<sup>th</sup> Avenue) the proposal avoids established single family neighborhoods in favor of more commercial corridors. See Comprehensive Plan – Policy Analysis, AR 236-245. In contrast, the EBCC's findings underlying Resolution 550 and disapproving the project do not address the project as a whole and focus only on the EBCC's narrow concerns regarding the aesthetics of 148<sup>th</sup> Avenue. The EBCC's disapproval of this project reaches beyond its jurisdiction, affecting over 12,400 citizens served by the substations at issue. Many of these customers reside outside the EBCC's jurisdiction and thus will not benefit by increase electrical reliability due to the EBCC's disapproval. See Staff Report Addressing Project Need and Service Area, AR 120-122.

---

<sup>3</sup> See AR 133.

In short, to the extent that the EBCC characterized 148<sup>th</sup> Avenue as an “urban boulevard” thus suggesting that the street is entitled to special protection or consideration under the Comprehensive Plan the EBCC is both factual and legally mistaken. Here, by mischaracterizing the nature of 148<sup>th</sup> Avenue, the EBCC attempts to support its not-in-my-backyard concerns at the expense of the project and the City as a whole.

## **VI. CONCLUSION**

The City joins in positions put for in PSE’s Opening Brief and requests that the trial court's Order dismissing PSE's LUPA petition be reversed and Resolution No. 550 be vacated.

Dated this 23rd day of May, 2016.

Respectfully submitted,

CITY OF BELLEVUE  
OFFICE OF THE CITY ATTORNEY  
Lori M. Riordan, City Attorney

A handwritten signature in black ink, appearing to read 'C.R. Barnes', written over a horizontal line.

Chad R. Barnes, 30480  
Assistant City Attorney  
Attorney for City of Bellevue

**DECLARATION OF SERVICE**

I, Kelly M. Thibodeau, declare under penalty of perjury under the laws of the State of Washington that on May 23, 2016, I caused **BRIEF OF RESPONDENT CITY OF BELLEVUE** to be served on the persons listed below:

Erin L Anderson  
Rita V. Latsinova  
Sara A. Leverette  
Stoel Rives, LLP  
600 University Street, Suite 3600  
Seattle, WA 98101  
Email: erin.anderson@stoel.com  
Email: rita.latsinova@stoel.com  
Email: sara.leverette@stoel.com

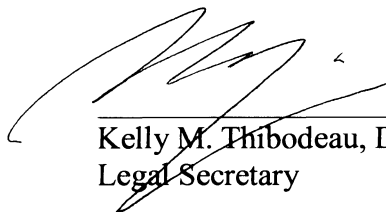
Kathleen J. Haggard,  
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601 Union Street, Suite 800  
Seattle, WA 98101  
Email: kathleen@pfrwa.com  
Email: andrea@pfrwa.com

Dawn Findlay Reitan  
Inslee Best Doezie & Ryder  
P.O. Box 90016  
Bellevue, WA 98009  
Email: dreitan@insleebest.com

By way of:

Email and regular U.S. Mail on May 23, 2016.

DATED at Bellevue, Washington on this 23rd day of May, 2016.

  
\_\_\_\_\_  
Kelly M. Thibodeau, Declarant  
Legal Secretary

FILED  
COURT OF APPEALS DIV 1  
STATE OF WASHINGTON  
2016 MAY 23 PM 4:01

# Attachment A

## Puget Sound Energy, Inc. v. E. Bellevue Cmty. Council

Decided Jan 30, 2017

No. 74464-0-I c/w No. 74465-8-I

01-30-2017

PUGET SOUND ENERGY, INC., Appellant/Cross Respondent, v. EAST BELLEVUE COMMUNITY COUNCIL, a community municipal corporation, Respondent/Cross Appellant, CITY OF BELLEVUE, a first class city organized pursuant to Washington law, Respondent.

---

COX, J.

UNPUBLISHED

— The primary issue in this Land Use Petition Act (LUPA) appeal is whether Puget Sound Energy Inc. (PSE) meets its burden to show that the EBCC's disapproval within its area of the city of Bellevue's approval of a conditional use permit was improper. Another issue is whether the EBCC lacks authority to review the shoreline conditional use permit approved by the city of Bellevue. \*2

We hold that [RCW 35.14.040\(3\)](#) does not give the EBCC authority to review shoreline conditional use permits approved by Bellevue. We affirm the trial court decision in this respect.

We also hold that PSE meets its burden under [RCW 36.70C.130](#) to show that the EBCC's disapproval within its area of Bellevue's approval of PSE's conditional use permit was improper. Accordingly, we reverse the trial court's decision in this respect.

PSE seeks to improve electrical service reliability in Bellevue by looping an overhead transmission line in its Lake Hills substation with its Phantom Lake substation. PSE applied to Bellevue for a conditional use permit and a shoreline conditional use permit to construct a 2.89 mile, 115kV transmission line connecting these two substations. The proposed line is to run along N.E. 8th Street, 148th Avenue N.E. and S.E., S.E. 16th Street, and 156th Avenue S.E. This is partially within the EBCC's area.

The EBCC is a community council, established in 1969 when Bellevue annexed the EBCC area. The northern boundary of this area is N.E. 8th Street. This area also includes 148th Avenue S.E. The service areas for the two respective substations to be linked by the project are only partially within the EBCC's area.

By virtue of Bellevue's annexation of the EBCC area, [RCW 35.14.040](#) provides the EBCC authority to affect whether land use ordinances approved by Bellevue become effective within the EBCC area. We discuss this statute and its application more fully later in this opinion. \*3

In October 2014, Bellevue's Development Services Department recommended approval, subject to conditions, of PSE's application for a conditional use permit and a shoreline conditional use permit. This followed review of the applications under Washington's State Environmental Policy Act (SEPA) and the issuance of a Mitigated

substantial to support his conclusion. Again, without this explanation, we must assume there is no sound basis for the EBCC's conclusion. Accordingly, substantial evidence does not support paragraph 13 of the EBCC's resolution.

### *Paragraph No. 16*

PSE argues that this paragraph is not supported by substantial evidence. We agree.

This paragraph of the EBCC's findings and conclusions states:

The project fails to achieve the desired benefit of redundancy because the "loop" cannot be completed as originally proposed. (Hearing Examiner Report at pp. iv and 36). PSE does not intend to construct the segment of the project along SE 16<sup>th</sup> until an unspecified date in the future. (Hearing Examiner Report at p. 54).<sup>30</sup>

<sup>30</sup> Administrative Record at 3020-21; Clerk's Papers at 24.

Although not explicitly mentioned in this paragraph, it apparently refers to LUC 20.20.255(E)(4). This  
18 provision requires that the applicant "demonstrate \*18 that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole . . . ." <sup>31</sup>

<sup>31</sup> LUC 20.20.255(E)(4), <http://www.codepublishing.com/WA/Bellevue/> (last visited January 17, 2017).

The record shows that Bellevue proposed that PSE "defer[]" construction of the S.E. 16th portion of the line due to a different city project affecting that area. In the meantime, PSE will install three switches on certain poles so the power to the Phantom Lake substation "can be switched from north or from the south."

PSE determined that the reliability impact of these switches "won't be as great as the completed project." But "further reliability improvement for [the] Phantom Lake substation will occur in the future when a second transmission line segment is added along Southeast 16<sup>th</sup> to provide a loop feed to the Phantom Lake substation."<sup>32</sup>

<sup>32</sup> Record of Proceeding (November 20, 2014) at 37.

Ultimately, the hearing examiner recommended that PSE "not be allowed to run a separate new transmission line down the south side of SE 16<sup>th</sup> Street." The hearing examiner also concluded that the project satisfied LUC 20.20.255(E)(4). As support for his conclusion, the hearing examiner cited testimony and a letter from PSE's engineer and a reliability study, which recommended an additional transmission line to the existing substations.

Although the current project does not fully achieve the improved reliability result that PSE originally  
19 anticipated, that does not mean that the project fails to \*19 "improve[] reliability to the customers served and reliability of the system as a whole."<sup>33</sup> The record shows that the project still improves reliability, but not as much as it would have as originally proposed. The EBCC acknowledges this fact in its brief. Thus, we conclude there is no substantial evidence to support paragraph 16 of the EBCC's resolution.

<sup>33</sup> LUC 20.20.255(E)(4), <http://www.codepublishing.com/WA/Bellevue/> (last visited January 17, 2017).

### *Decision Outside the EBCC's Authority*

PSE argues that the EBCC exceeded its authority by passing Resolution 500. We disagree.

Under [RCW 36.70C.130\(1\)\(e\)](#), we may grant PSE relief if it establishes that the EBCC's decision "is outside [EBCC's] authority or jurisdiction." This is a question of law that we review de novo.<sup>34</sup>

<sup>34</sup> See Phoenix Dev., Inc. v. City of Woodinville, 171 Wn.2d 820, 828, 256 P.3d 1150 (2011).

Under [RCW 35.14.040\(3\)](#), the EBCC has the authority to approve or disapprove conditional use permits approved by Bellevue to the extent of property within the EBCC's area.<sup>35</sup> But this statute also provides that the community council's disapproval "shall not affect the application of any ordinance or resolution affecting areas  
20 outside the community municipal corporation."<sup>36</sup> \*20

<sup>35</sup> See [RCW 35.14.040](#).

<sup>36</sup> Id.

Here, the EBCC exercised its authority under [RCW 35.14.040\(3\)](#) to disapprove Bellevue's Ordinance 6226. The trial court properly concluded that the EBCC's decision was not outside its authority or jurisdiction to the extent of its area. Thus, the trial court concluded that PSE failed to satisfy its burden under [RCW 36.70C.130\(1\)\(e\)](#).

PSE makes several arguments in an attempt to show that the EBCC exceeded its authority. We do not address all of them because it is unnecessary to do so in view of our disposition of this appeal.

This is not the first dispute between these litigants over the application of [RCW 35.14.040](#) to land use issues. In City of Bellevue v. East Bellevue Community Council, this statute was at issue in connection with the EBCC's disapproval of certain Bellevue actions.<sup>37</sup> In that case, the supreme court stated:

<sup>37</sup> 138 Wn.2d 937, 939, 983 P.2d 602 (1999).

The obvious purpose of the statute is to place final decision-making power in the community council where land use regulations affecting property *within its jurisdiction* are concerned. [RCW 35.14.040](#) provides a community council with authority to independently determine whether to approve or disapprove land use legislation affecting territory *within its jurisdiction*, in keeping with the Legislature's intent to allow local level decision making. Therefore, where there is room for exercise of discretion as to whether particular land use regulations should be applied to property *within the municipal corporation*, the community council must be allowed to exercise that discretion to carry out the legislative intent underlying [RCW 35.14.040](#).<sup>38</sup>

21 \*21

<sup>38</sup> Id. at 945 (emphasis added).

Here, the EBCC exercised its authority to disapprove within its jurisdiction the conditional use permit authorized by Bellevue. Thus, the primary question is whether there was room for the EBCC to exercise its discretion in doing so.

PSE argues, for the first time in its reply brief, that the EBCC "asserts the right to unilaterally affect the reliability of power to Bellevue homeowners outside its territory." Because PSE makes this argument for the first time in its reply brief, it is too late for us to consider.<sup>39</sup> We decline to do so.

<sup>39</sup> See Cowiche Canyon Conservancy v. Bosley, 118 Wn.2d 801, 809, 828 P.2d 549 (1992); RAP 10.3(c).

However, Bellevue makes a similar argument as a respondent. It argues that the EBCC's decision, if left standing, would have an extraterritorial affect because it will affect citizens outside the EBCC's area.

As we discussed earlier in this opinion, the area over which EBCC has jurisdiction is bounded on the north by NE 8th Street. The area includes 148th Avenue S.E., and the service area for the two substations to be linked by the project are only partially within the EBCC's area.

RCW 35.14.040 provides that the EBCC's disapproval "shall not affect the application of any ordinance or resolution affecting areas outside the community municipal corporation." Because we hold that PSE has met its burden to show that the EBCC's resolution is improper, we need not also decide whether the resolution violates the geographical limitations of this statute. Accordingly, that is an issue left for decision another day. \*22

### *Clearly Erroneous Application of the Law to the Facts*

PSE argues that the EBCC erroneously applied the law to the facts by failing to accord substantial weight to the hearing examiner's recommendation. In making this argument, PSE focuses on paragraphs 4, 6, 13, and 14 of the EBCC's findings and conclusions. Because, for the reasons previously stated in this opinion, we focus on other paragraphs of the resolution, we need not address these arguments.

### *Erroneous Interpretation of the Law*

PSE argues in its opening brief that the EBCC erroneously interpreted the law. PSE fails to state which law the EBCC erroneously interpreted. Accordingly, we need not address this argument.<sup>40</sup>

<sup>40</sup> See Darkenwald v. Emp't Sec. Dep't, 183 Wn.2d 237, 246, 350 P.3d 647 (2015); RAP 10.3(a)(6).

The parties also argue other issues regarding the conditional use permit in their briefing. Because of our disposition of this case, we need not address those other arguments.

## **JURISDICTION TO REVIEW**

### **SHORELINE CONDITIONAL USE PERMITS**

On cross appeal, the EBCC argues that the trial court improperly concluded that the EBCC lacks jurisdiction to approve or disapprove the shoreline conditional use permit granted by Bellevue in this case. We hold that the plain words of RCW 35.14.040(3) do not give the EBCC jurisdiction to approve or disapprove shoreline conditional use permits granted by Bellevue. \*23

We interpret statutes to determine and apply the legislature's intent.<sup>41</sup> The legislature's intent is solely derived "from the statute's plain language, considering the text of the provision at issue . . . ." <sup>42</sup>

<sup>41</sup> Segura v. Cabrera, 184 Wn.2d 587, 591, 362 P.3d 1278 (2015).

<sup>42</sup> Id.

"Where a statute specifically designates the things or classes of things upon which it operates, an inference arises in law that all things or classes of things omitted from it were intentionally omitted by the legislature under the maxim *expressio unius est exclusio alterius*—specific inclusions exclude implication."<sup>43</sup>

<sup>43</sup> Wash. Nat. Gas Co. v. Pub. Util. Dist. No. 1 of Snohomish County, 77 Wn.2d 94, 98, 459 P.2d 633 (1969).

We review *de novo* questions of statutory interpretation.<sup>44</sup>

<sup>44</sup> Western Plaza, LLC v. Tison, 184 Wn.2d 702, 707, 364 P.3d 76 (2015).



## Pittman, Reilly

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**From:** EBCC  
**Sent:** Thursday, June 24, 2021 9:18 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Energize Eastside petition signature map

Chair Hummer and EBCC members,

I am forwarding written communication from CENSE regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to CENSE or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

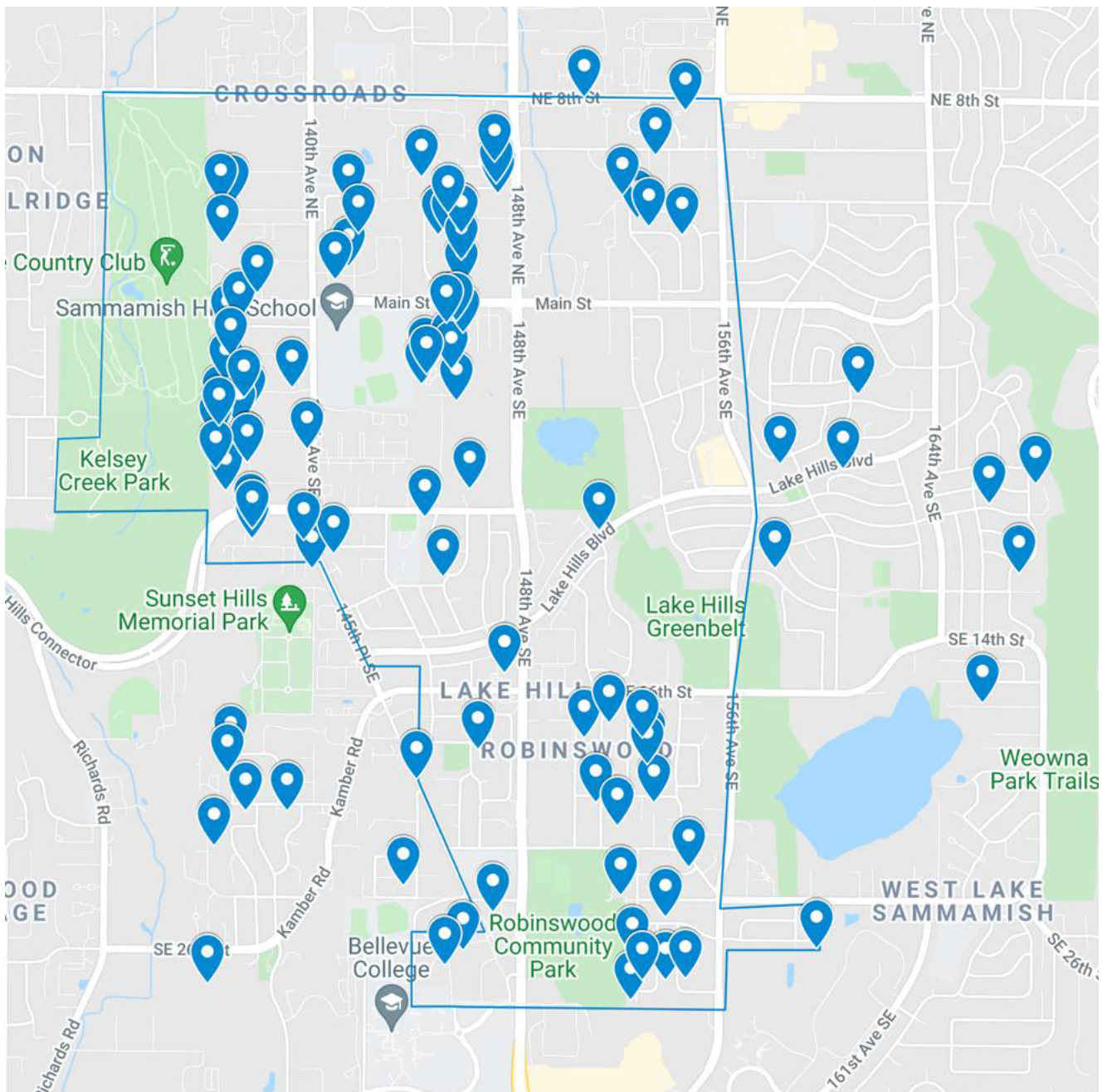
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**From:** donmarsh@cense.org <donmarsh@cense.org>  
**Sent:** Wednesday, June 23, 2021 10:40 AM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Energize Eastside petition signature map

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear council members,

CENSE submits the following map for inclusion in the public record of EBCC's courtesy hearing on PSE's Energize Eastside project.



Each blue pin shows the location of a Bellevue resident who signed the CENSE petition opposing Energize Eastside. The signatures were gathered in person and online during the week before the initial hearing. The online instructions asked for signatures only from people living in Lake Hills, but some of the online registrations came from outside EBCC's jurisdiction. If desired, we can filter only addresses within the EBCC boundary, but the raw data demonstrates concern from people throughout Bellevue and neighboring cities.

There are 142 locations plotted on this map. However, at this scale, some of the pins are obscured by overlapping pins. EBCC's boundary is shown as a blue line in the map.

If you would like to see a live map, try this URL:

[https://www.google.com/maps/d/u/0/edit?mid=1tDjTmZeOxM8XoiSO36c0Yg\\_7S8wALP75&ll=47.60295322789062%2C-122.14548207187501&z=14](https://www.google.com/maps/d/u/0/edit?mid=1tDjTmZeOxM8XoiSO36c0Yg_7S8wALP75&ll=47.60295322789062%2C-122.14548207187501&z=14)

If you zoom in, you can see more pins in EBCC's area. If you zoom out, you can see signers who live farther away. While opposition to the project is somewhat correlated to proximity from the utility corridor, it's clear the project isn't only

opposed by nearby neighbors with aesthetic or safety concerns. Every PSE electric customer will pay for this project through higher bills that will persist for decades. Over the life of the project, these costs could exceed \$1,000 per customer.

Thank you for your careful consideration of this project on behalf of your constituents.

Sincerely,

Don Marsh  
President, CENSE.org

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Friday, June 4, 2021 8:49 AM  
**To:** Hummer, Betsi; Kasner, Steve; Dhananjaya, Hassan; Gooding, Ross; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Thank You for Energize Eastside Courtesy Hearing

Chair Hummer and EBCC members,

I am forwarding written communication from Curtis Allred regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Allred or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** CA <curtallred@live.com>  
**Sent:** Thursday, June 03, 2021 5:11 PM  
**To:** Hummer, Betsi <BHummer@bellevuewa.gov>; Dhananjaya, Hassan <HDhananjaya@bellevuewa.gov>; Epstein, Ron <REpstein@bellevuewa.gov>; Gooding, Ross <RGooding@bellevuewa.gov>; Kasner, Steve <SKasner@bellevuewa.gov>; EBCC <EBCC@bellevuewa.gov>  
**Subject:** Thank You for Energize Eastside Courtesy Hearing

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear EBCC Members,

Thank you for hosting an excellent Energize Eastside courtesy hearing last Tuesday night, and your willingness to stay late to give everyone a chance to speak on this important issue. It is much appreciated. I especially appreciate Chair Hummer's and Councilmember Kasner's commitment to ensuring citizen input is heard and considered.

Looking forward to more public forums on Energize Eastside.

Sincerely,  
Curtis Allred

To Heidi Bedwell, Environmental Planning Mngr, City of Bellevue [hbedwell@bellevuewa.gov](mailto:hbedwell@bellevuewa.gov) 6/2/21

**Flyer dated around 5/22/21 'Notice of application and public meeting Energize Eastside - North Bellevue Segment'**

My family has lived 2 houses away from your proposed pylon work at NE 48<sup>th</sup> Place for 19 years. I received your flyer and attended the Zoom meeting on 6/2/21.

1. Why so little notice for such an important meeting immediately after a holiday weekend? I had no time to read up on it. The last time I heard much about this project was years ago.
2. Accessing the Zoom was confused. Why did you not post the meeting link/password in the flyer?
3. What is the EBCC and what does that have to do with the homeowners living in Bridle Trails? Do our elected council members no longer represent our interests here in Bridle Trails?
4. Having finally accessed the Zoom meeting at 6.30pm, the meeting was immediately adjourned until 7.30pm for EBCC to discuss a legal issue. Why not handle this at a later date, so the people who were attending from Bridle Trails at such short notice could meet at your announced time?
5. The meeting continued for 4 hours until 10.30pm, after discussions around whether to delay/go ahead, but by that time some folks had to leave to deal with family and other matters. Could you please reconsider holding your meeting in a more resident friendly and efficient manner?
6. The meeting ended with EBCC deciding to hold their discussion around the project at their next scheduled meeting on July 6<sup>th</sup> at 6.30pm. Why are the homeowners in Bridle Trails being held to a scheduled meeting for EBCC, which has nothing to do with the Bridle Trails neighborhood? This is the first day at work after the holiday weekend and some folks may still be out of town.
7. Why are you not arranging a separate meeting specifically for Bridle Trails? We are a unique neighborhood with our own concerns and should be given the time to be heard.
8. Please confirm that the current pylons/power line poles are currently 54'-79' high and that PSE proposes to replace them with pylons/poles that are 77'-121' high. Are these heights correct and what height specifically is proposed for the trail that runs behind Trails End and Brentwood Lane (NE 48<sup>th</sup> Pl) neighborhoods? How much deeper will PSE have to dig to install the new pylons/poles compared with the current depth?
9. What is the exact number of trees that PSE will remove next to the trail that runs behind Trails End and Brentwood Lane (NE 48<sup>th</sup> Pl) neighborhoods? Will other vegetation be removed either in private yards, or on the trails? Will you be replacing such vegetation with similar? What height and type of trees will PSE be planting to replace the trees removed?
10. Someone mentioned that the pylons/poles will be steel and 4-6' in diameter – is this correct? Again, specifically what diameter are PSE using for the trail that runs behind Trails End and Brentwood Lane? Steel of such height and diameter seems more suited to pylons/poles along a major road or industrial area rather than our old neighborhoods adjoining ancient woodland.
11. Will PSE, if the project goes ahead, be carrying out any work nearer to the Olympic Pipeline than the current wooden pylons/poles? What safety measures are being put in place to protect the Pipeline. It carries gasoline, diesel and large amounts of jet fuel and the nearest fire engine equipped to deal with any leak/fire is at SeaTac airport. Will PSE be required to pay for a fire engine with jet fuel trained staff, to be based on the eastside to reach any leak/fire quicker?
12. NE 48<sup>th</sup> Place is a private road where the **Brentwood Lane Property Owners Association** owns an easement on the trail that is on top of the Olympic Powerline, and under the electricity cables at the very west of NE 48<sup>th</sup> Place. The powerlines that PSE now proposes to replace from

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Thursday, June 3, 2021 4:49 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Pushback in East Bellevue

Chair Hummer and EBCC members,

I am forwarding written communication from Gerald Hughes regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Hughes or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** Gerald Hughes <ghughes@isomedia.com>  
**Sent:** Thursday, June 03, 2021 12:42 PM  
**To:** CENSE <mail@cense.org>; EBCC <EBCC@bellevuewa.gov>; Jared Nieuwenhuis <jared@jaredforbellevue.com>; Janice Zahn <janicezahn8@gmail.com>; Lynne Robinson <lynnrpt@live.com>; Mindy Garner <mindy@eldermove.com>; Warren Halverson <whalvrsn1@frontier.com>; Don Marsh <don.m.marsh@hotmail.com>  
**Subject:** Re: Pushback in East Bellevue

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Unfortunately, the BELlevue City Council will continue to support Energize Eastside. The city has always been in bed with PSE starting with Puget Power. Even if it makes no sense, and it doesn't, there will be a reason they have to approve it..... usually a legal issue so they don't have to take responsibility. And of course, even if the EBCC rejected it and then won in the courts, PSE will just change the route to avoid EBCC. In the meantime, they will hold some more public meeting but public input will be ignored. And so it goes...

On Jun 3, 2021, at 10:00 AM, CENSE <mail@cense.org> wrote:

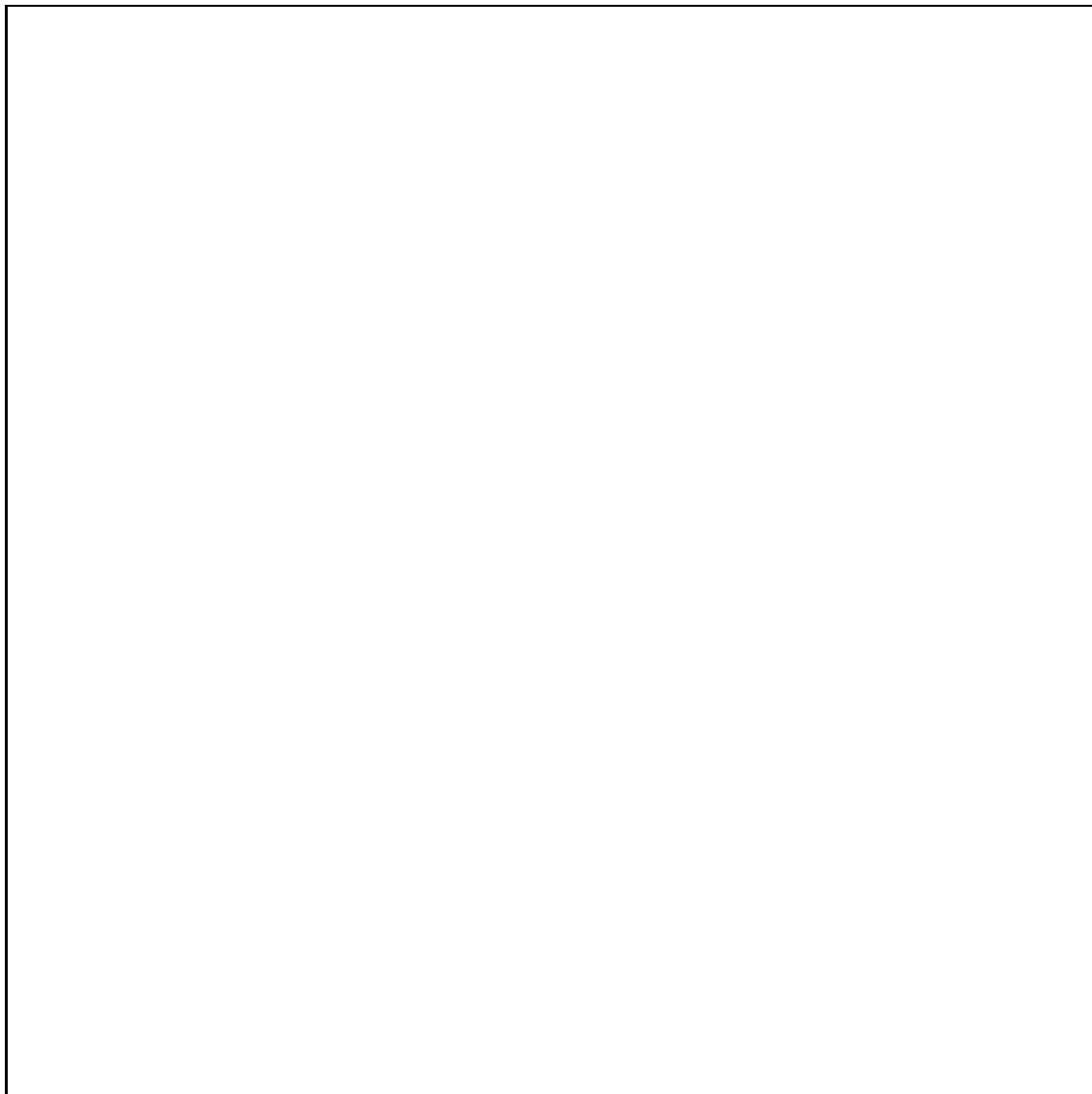
**CENSE** Coalition of Eastside Neighborhoods  
for Sensible Energy

[CENSE.org](http://CENSE.org)

On Tuesday evening, PSE updated members of the East Bellevue Community Council on the company's plans to build Energize Eastside. PSE simply recycled the same arguments we've heard for the past seven years:

1. "Look at these old photos! Isn't it amazing how much the Eastside has grown?"
2. "There will be more trees, not fewer."
3. "We've been operating next to the pipelines for 50 years – no accidents!"

PSE didn't show any graph to demonstrate increasing demand for electricity. Or whether the project is needed in winter or summer. Or if new technologies like solar panels and batteries might provide a better future for the Eastside.



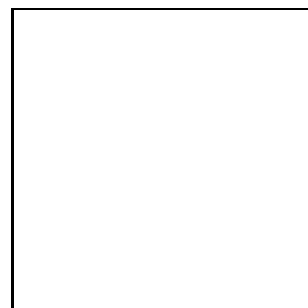
*PSE's sole argument for Energize Eastside: "Look how we've grown!"*

Following PSE's presentation, 23 speakers testified in opposition to the project. Energize Eastside is old technology based on inaccurate and out-of-date forecasts. It would cost customers over ONE BILLION dollars during its lifetime.

PSE's presentation ignored all these concerns.

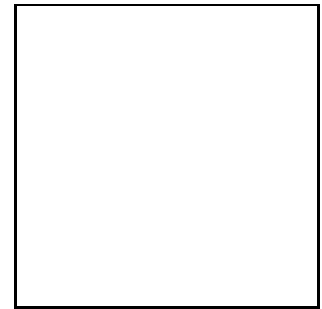
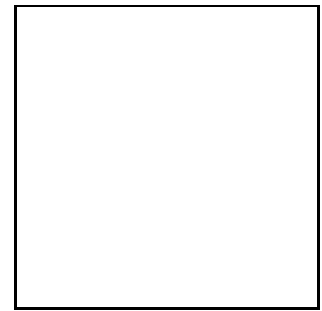
As time grew late, council members voted to

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postpone the rest of the hearing until the council meets on July 6. At that time, councilors will discuss the project and ask questions. Another informational meeting is planned for the North Bellevue Segment next fall, and the land use hearing will be held after that. Stay tuned!



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Bellevue, Wa 98006

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## Pittman, Reilly

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**From:** Barbara Hughes <barbara\_hughes@hotmail.com>  
**Sent:** Wednesday, June 2, 2021 7:54 PM  
**To:** Bedwell, Heidi  
**Cc:** William Barnes; Linda Treece; debbieatbcds@gmail.com; info@cense.org; llopez@mstarlabs.com  
**Subject:** Energize Eastside, Bridle Trails, meeting 6/1/21  
**Attachments:** Letter by email to COB re Power lines.docx

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To Heidi Bedwell, Environmental Planning Mngr, City of Bellevue [hbedwell@bellevuewa.gov](mailto:hbedwell@bellevuewa.gov) 6/2/21

**Flyer dated around 5/22/21 'Notice of application and public meeting Energize Eastside - North Bellevue Segment'**

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12. NE 48<sup>th</sup> Place is a private road where the **Brentwood Lane Property Owners Association** owns an easement on the trail that is on top of the Olympic Powerline, and under the electricity cables at the very west of NE 48<sup>th</sup> Place. The powerlines that PSE now proposes to replace from

115kV to 230kV. This trail is in regular use by the homeowners in Brentwood Lane, and the surrounding neighbors. In beautiful Bridle Trails neighbors enjoy the trees and nature for exercise, to ride in the State Park, to walk their dogs and to chat with everyone they meet. The trails are heavily used and enjoyed. For us, this is an important part of why we moved here.

13. Where can I find more information regarding the many comments from speakers alleging that PSE's future projections for peak capacity are out of date and that there is no need for this upgrade? This is the first I have heard of this. Has the CoB produced any literature or calculations itself around this? It seems to be a fundamental difference of opinion.
14. Finally, what thought has been given to instead promoting solar panels, battery storage and the like rather than bigger power lines/pylons/poles?

Sincerely,

Barbara (and Richard) Hughes

13709 NE 48<sup>th</sup> Pl, Bellevue WA98005    [barbara\\_hughes@hotmail.com](mailto:barbara_hughes@hotmail.com)

CC Brentwood Lane Property Owners Association (HOA for Ne 48<sup>th</sup> Pl.) President – William Barnes  
[williambarnesconsulting@gmail.com](mailto:williambarnesconsulting@gmail.com)

BLPOA Secretary – Linda Treece    [ljtreece@comcast.net](mailto:ljtreece@comcast.net)

Trails End Neighborhood HOA    Deborah Hayes, Governor    [debbieatbcds@gmail.com](mailto:debbieatbcds@gmail.com)

CENSE (Cense.org Coalition for Eastside Neighborhoods for Sensible Energy)    [info@cense.org](mailto:info@cense.org)

Bridle Trails Community Club    [llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Wednesday, June 2, 2021 4:27 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: EBCC Courtesy Hearing Information

Chair Hummer and EBCC members,

I am forwarding written communication from John Ellis regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Ellis or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** John Ellis <LOWTONEONE@msn.com>  
**Sent:** Tuesday, June 01, 2021 10:17 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Re: EBCC Courtesy Hearing Information

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Thank you for your dedication and for extending the meeting!

I hope EBCC has some influence with the City of Bellevue, but I fear the project will get built regardless of what we want.

Thank you again,  
John Ellis

Sent from my iPad

On 1 Jun 2021, at 16:49, EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)> wrote:

Hi John,

The East Bellevue Community Council values community input and looks forward to hearing from you during its virtual courtesy hearing on June 1.

The meeting will be conducted via Zoom. I have included the webinar ID and password below, as well as a direct link. FYI - You will likely still need the password even if you use the link.

At the appropriate time, I will call your name and then unmute you. Once we have confirmed that we can hear you, your time will begin. You will be allowed 3 minutes to make your statement. You will see a

timer on the screen (assuming you connect with a computer) counting down. When you reach 0:00 you will have reached the end of your time. If you will be connecting to the meeting via a phone, please let me know and I will provide you the phone number to call in.

Please let me know if you have any questions.

Webinar ID: 910 8566 2473

Passcode: 397373

<https://cityofbellevue.zoom.us/j/91085662473>

**Karin Roberts, CMC** | Deputy City Clerk

City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** [itdwebteam@bellevuewa.gov](mailto:itdwebteam@bellevuewa.gov) <[itdwebteam@bellevuewa.gov](mailto:itdwebteam@bellevuewa.gov)>

**Sent:** Tuesday, June 01, 2021 3:43 PM

**To:** EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)>

**Subject:** Webform submission from: EBCC Public Hearing

Submitted on Tue, 06/01/2021 - 15:42

Submitted by: Anonymous

Submitted values are:

**Meeting Selection**

Courtesy Hearing B

**Name**

John Ellis

**Preferred method of contact for this meeting**

Phone

**Preferred method of contact for notice of future hearings on this topic**

Email

**Email**

[lowtoneone@msn.com](mailto:lowtoneone@msn.com)

**Phone**

[206-947-0106](tel:206-947-0106)

**Address**

2230 135th PL SE

Bellevue, Washington. 98005

{Empty}

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Wednesday, June 2, 2021 4:25 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Speaking at tonight's meeting and need Zoom link

Chair Hummer and EBCC members,

I am forwarding written communication from Anne Newcomb regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Ms. Newcomb or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** Anne Newcomb <anne@annenewcomb.net>  
**Sent:** Tuesday, June 01, 2021 10:06 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Re: Speaking at tonight's meeting and need Zoom link

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Thanks for extending your meeting to hear our comments! Sending my comment just in case you need it.  
Anne

Hello, my name is Anne Newcomb and I am co lead of the WA clean energy coalition and a member of the WA State Sierra Club energy committee.

Thank you for taking time to hear our concerns on this very important issue. Energize Eastside will adversely affect many Eastside residents and pose a danger to the neighborhoods as well as waste ratepayer money all for an unlikely situation that has not yet happened.

I have attended most of PSE's 2021 Integrated Resource Plan meetings and have been happy to see PSE's focus on efficiency and am impressed with the huge reduction in demand with these efforts over the next 10 years including peak demands.

Investing in distributed clean energy like local solar and battery storage can also help meet peak demands without the need to build new local transmission lines. It also has the added benefit of helping PSE reach the Clean Energy Transformation Act requirements and will help locally With Bellevue's K4C emissions reduction goals. Solar energy has reduced in price by nearly 70% since 2013 and battery storage has dropped in price nearly 80% and is still dropping. PSE has not factored price and efficiency improvements of solar and batteries into their analysis and the last study completed by



PSE for Energize Eastside was in 2015. Local Solar and Batteries combined can help meet both summer and winter peak demand which is a much better solution than Energize Eastside.

Please use your power to reject this unnecessary, dangerous wasteful project and move us into a safer, brighter, and cleaner future.

On Jun 1, 2021, at 5:16 PM, EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)> wrote:

Hi Anne,

I just sent you the connection details for the meeting. Please let me know if you did not receive the email.

Karin

Karin Roberts, CMC | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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

From: Anne Newcomb <[anne@annewcomb.net](mailto:anne@annewcomb.net)>  
Sent: Tuesday, June 01, 2021 5:08 PM  
To: EBCC <[EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)>  
Subject: Speaking at tonight's meeting and need Zoom link

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi,

I signed up to speak at tonight's hearing the other day in regards to Energize Eastside and did not see an email with the meeting details so I just signed up again.

How shall I go about getting meeting details like the Link?

Thanks for your help and looking forward to seeing you tonight!

Anne Newcomb

Sent from my iPad

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Wednesday, June 2, 2021 4:24 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Energize Eastside North Segment comments for June 1, 2021 Courtesy Meeting

Chair Hummer and EBCC members,

I am forwarding written communication from Curtis Allred regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Allred or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** CA <curtallred@live.com>  
**Sent:** Tuesday, June 01, 2021 9:54 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Energize Eastside North Segment comments for June 1, 2021 Courtesy Meeting

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

(This is a written version of comments delivered verbally during the Courtesy Meeting tonight)

Dear East Bellevue Community Council,

I have been a Bellevue resident for 15 years, and have been following Energize Eastside for about half of that... since 2014 when I participated in the original Community Advisory Group meetings. I also participated in the EIS process, which involved dozens of public meetings. For the past 2 years I have attended all the permit application hearing meetings in Bellevue and Renton, and anticipating an upcoming hearing in Newcastle.

Over the years I have become convinced that this project is not needed, based on critical data revealed by CENSE and other third-party sources, and based on PSE's evasive posture and conflicting marketing material. I believe PSE is pursuing the project purely for financial gains for their shareholders.

Other speakers have provided details on these points as well as explaining how dangerous and destructive the project is, and rather than repeating those points, I will keep it short by simply concurring with their statements.

It's shameful that this project is still on the table, after years of falling power demand, and the introduction of new grid and power generation technologies. We should be investing in these modern technologies to improve the reliability and de-carbonize our energy supply, rather building massive, outdated infrastructure projects.

Thank you for your time.  
Sincerely,

Curtis Allred  
13609 SE 43rd Pl, Bellevue

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Tuesday, June 1, 2021 4:48 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Energize Eastside North Segment June 1/2021 Public Meeting File 21-104991 LB and 21-104989 LO

Chair Hummer and EBCC members,

I am forwarding written communication from Norm Hansen regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Hansen or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** NORMAN HANSEN <hansennp@aol.com>  
**Sent:** Tuesday, June 01, 2021 3:18 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Cc:** BTCCBoard@googlegroups.com  
**Subject:** Energize Eastside North Segment June 1/2021 Public Meeting File 21-104991 LB and 21-104989 LO

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

### Subject: Reason Why the EBCC Should Deny the North Segment Permit

**Point 1/ Land Use Code:**The described Electrical Facility does not meet Bellevue's Land Use code 20.20.255. *"Where feasible, the preferred site alternative identified in subsection **D.2.d** of this section is located within the **land use** district requiring additional service and residential **land use** districts are avoided when the proposed new or expanded **electrical utility facility** serves a nonresidential **land use** district"*

PSE has not provided data to show the need in residential land use districts such as Lake Hills and Bridle Trails.

**Point 2/ EQUITY:** Bridle Trails Subarea of residential housing already has six(6) High Voltage Transmission Lines including two(2) sub

**stations with a third sub station planned. In addition, a switching station in Bridle Trails is planned if EE North segment is built.**

**Compare this with the downtown core with no overhead transmissions lines and no substations.**

**PSE has already used this route for about 100 years when it was initially open country. Now this facility is outdated and does not meet the future vision of a modern city. Enough is Enough. It is time to consider other modern alternatives.**

**My name is Norman Hansen 3851 136th Ave.NE, Bellevue,98005:  
Integrated Resource Plan Technical Member; PSE Citizens Advisory group(2013) and Bellevue Annual Electrical Reliability Workshop. BSEE  
Michigan State University**

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Tuesday, June 1, 2021 2:28 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Written Comments - EBCC Energize Eastside Hearing, June 1, 2021  
**Attachments:** EBCC - Braun Energize Eastside Comments June 1 2021s.pdf

Chair Hummer and EBCC members,

I am forwarding written communication from Barbara Braun regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Ms. Braun or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** b braun <bbraun@live.com>  
**Sent:** Tuesday, June 01, 2021 1:59 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Cc:** b braun <bbraun@live.com>  
**Subject:** Written Comments - EBCC Energize Eastside Hearing, June 1, 2021

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Attached are the comments I will present this evening - East Bellevue Community Council Courtesy Hearing, Energize Eastside - North Bellevue Segment Public Commen

Barbara Braun  
13609 SE 43<sup>rd</sup> Place  
206-280-7308

I'm Barbara Braun. I've lived in Bellevue for 16 years and am highly engaged with several community organizations including 300 Trees.

My comments cover two points.

## First: We must stop cutting down our trees

Bellevue's Environmental Stewardship Plan calls for 40% urban tree canopy. To achieve this, we must plant 75,000 trees, or 2500 trees per year, every year, through 2050 (assuming zero tree loss).<sup>6</sup>

Lake Hill's tree canopy is considered low at ~ 31%.<sup>7</sup>

PSE already cut down ~ 300 trees in 2020 for the 148<sup>th</sup> project which have yet to be replaced.

This project could further erode Lake Hills tree canopy by removing another 1043 trees from North Bellevue.<sup>1</sup>

PSE plans to replace the quote unquote "significant trees" which they assess at 433. 386 (or 89%) of the significant trees are on private property.<sup>1</sup>

There is no guarantee replacement trees will be planted in Lake Hills. PSE states replacement trees may need to be planted elsewhere in the city due to private property and right of way complexities.<sup>1</sup>

Mature trees are more valuable than newly planted trees:

- They are a primary component of our city's beauty and view scape.
- They cool us and clean our air in our now hot smokey summers.
- They store more carbon than immature trees.<sup>8</sup>

We must stop needlessly cutting down trees.

## Second: Your leadership is needed now

As you have heard tonight, the need for Energize Eastside is dubious, as demonstrated by PSE's own forecasts submitted to the UTC - Washington Utilities and Transportation Commission.

The costs of this project are high and deliver no benefits to Bellevue residents, including Lake Hills residents, AND importantly, no benefits to Bellevue businesses. Impacts include:

- No improvement in energy reliability.
- No path to clean energy.
- Impacts on our tree canopy and canopy maturity.<sup>1</sup>
- Poles 30-45 feet higher than existing poles.<sup>2</sup>
- AND an estimated \$1 Billion lifetime cost to ratepayers.<sup>3</sup>

All this to avert an energy demand scenario with near zero probability of ever occurring even accounting for all the growth and the electric vehicles planned for Bellevue.

We can no longer afford to indulge corporate profits at the expense of our community. We must accept our planet is in crisis. We must cut greenhouse gas emissions by 50% by 2030, i.e., in less than 9 years.<sup>4</sup>

We must act and act fast.

Thank you for taking time to learn about Energize Eastside. PSE has chosen to ask local jurisdictions to permit piecemeal sections of this ill-founded project. It falls to leaders like you to do the right thing.

I ask you to deny the permits.

Thank you.

Barbara Braun

13609 SE 43<sup>rd</sup> Place

End Notes:

1. North Segment Permit Plans and Reports, Vegetation Inventory & Management Plan Report for the North Bellevue Segment, Sections 2.3.1, 5.1, 7.2., <https://bellevuewa.gov/city-government/departments/development/zoning-and-land-use/public-notice-and-participation-2>

Table 4. Tree replacement ratios for the Energize Eastside Project in North Bellevue (not including public right-of-way tree removals).

Tree Size (DBH)	Replacement Ratio	Impacted Live Trees/Shrubs	Replacement Trees
< 6"	As requested by property owner	464	TBD
6" to ≤ 12"	1:1	420 <sup>2</sup>	420
> 12" to < 30"	2:1	158	316
≥ 30"	3:1	1	3
<b>Total Proposed Removal and Replacement =</b>		<b>1,043</b>	<b>739+</b>

Table 3. Significant trees proposed for removal categorized by tree location and overlapping critical area type.

	Non-Critical Areas	Critical Areas <sup>1</sup>	Buffers <sup>2</sup>	Setbacks <sup>3</sup>	Total <sup>4</sup>
Private Property	285	16	81	4	386
City right-of-way	11	1	5	1	18
City-owned Property	0	0	2	0	2
PSE-owned Property	20	1	6	0	27
<b>Total</b>	<b>316</b>	<b>18</b>	<b>94</b>	<b>5</b>	<b>433</b>

2. North Segment Permit Plans and Reports, Photo Simulations, [https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/Photo%20Simulation.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/Photo%20Simulation.pdf)
3. <https://cense.org/energize-eastside/>
4. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030-greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean-energy-technologies/>
5. <https://bellevuewa.gov/city-government/departments/community-development/environmental-stewardship/esi-strategic-plan>
6. Bellevue Environmental Stewardship Plan, <https://bellevuewa.gov/city-government/departments/community-development/environmental-stewardship>
7. Bellevue WA - Full Tree Canopy Assessment Report, [https://bellevuewa.gov/sites/default/files/media/pdf\\_document/Bellevue%20WA%20-%20Full%20Tree%20Canopy%20Assessment%20Report%20-%202018\\_FINAL-compressed%20-%20Copy.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/Bellevue%20WA%20-%20Full%20Tree%20Canopy%20Assessment%20Report%20-%202018_FINAL-compressed%20-%20Copy.pdf)
8. Koberstein & Applegate, May 2019, <https://news.mongabay.com/2019/05/tall-and-old-or-dense-and-young-which-kind-of-forest-is-better-for-the-climate/>



## Pittman, Reilly

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**From:** EBCC  
**Sent:** Tuesday, June 1, 2021 10:58 AM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Comments regarding PSE's Energize Eastside project

Chair Hummer and EBCC members,

I am forwarding written communication from Tess McMillan regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Ms. McMillan or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

Karin Roberts, CMC | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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

From: Tess McMillan <tessmcm@gmail.com>  
Sent: Tuesday, June 01, 2021 10:38 AM  
To: EBCC <EBCC@bellevuewa.gov>  
Subject: Comments regarding PSE's Energize Eastside project

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear EBCC:

As a homeowner in Bellevue (Sherwood Forest neighborhood), I am completely against PSE's Energize Eastside project. I understand you will be meeting tonight to discuss the project.

I don't even know where to begin to describe what I think is wrong with this project, there are so many wrong issues. I would like to list my comments against the project ahead of your meeting tonight.

I'll list my issues as bullet points:

- Destroys the environment and tree canopy. The tree canopy cannot be recovered.
- Utilizes invasive, dangerous, as well as outdated/outmoded technology.
- Uses technology that has been linked to cancer.
- Is not a sustainable solution.
- Is ugly. A complete blight on our neighborhoods.
- Is putting the solution to a region's needs (and we haven't all agreed there is a need) in the backyard of only some of us.
- Is fostered by a for-profit corporation headquartered outside the Pacific NW (headquartered outside the U.S., even!) that is not under the control of the public.
- Takes away our choice and control.

I do not agree that we need this project and I don't think it is just.  
If you are voting about the project tonight I urge you to deny the project/permitting of the project.

Thank you,

Tess McMillan  
Bellevue, WA

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Monday, May 31, 2021 7:14 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Hummer, Betsi; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: SUPPORT the PSE's Energize Eastside transmission upgrade

Chair Hummer and EBCC members,

I am forwarding written communication from Dr. Y Kravchenko regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Dr. Y Kravchenko or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** Raev 111 <raev111@outlook.com>  
**Sent:** Monday, May 31, 2021 2:25 PM  
**To:** EBCC <EBCC@bellevuewa.gov>; Roberts, Karin <KRoberts@bellevuewa.gov>  
**Cc:** Hummer, Betsi <BHummer@bellevuewa.gov>; Dhananjaya, Hassan <HDhananjaya@bellevuewa.gov>; Epstein, Ron <REpstein@bellevuewa.gov>; Gooding, Ross <RGooding@bellevuewa.gov>; Kasner, Steve <SKasner@bellevuewa.gov>  
**Subject:** SUPPORT the PSE's Energize Eastside transmission upgrade

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear East Bellevue Community Council (EBCC),

I am a property owner (2107 138th Ave SE, Bellevue, WA) who currently has two sets of power lines in my backyard and therefore am directly affected by the Energize Eastside project.

**I believe that opinion of the residents, who are affected the most by the project due to having power lines on their property, should carry more weight and have more impact than the opinion of residents who are not directly affected by the project.**

**I SUPPORT the PSE's Energize Eastside transmission upgrade because I believe that it will greatly improve safety of residents who have electrical wires on their properties and close to their homes. I kindly ask EBCC to ALLOW the permits for PSE's Energize Eastside project.**

A group of people called CENSE, who are indirectly or not at all affected by the project, have been encouraging everyone (including people who do not live in the area) to sign a petition against the project while providing insufficient or limited information to support their stand.

CENSE claims that the project will destroy significant trees in Lake Hills and install poles 20-30 feet taller than existing poles - all of these actions are justified since human life and safety are more important!

CENSE claims that the project will raise electricity bills for many decades - this is a justifiable cost since safety of residents who had given easements for power lines, making it possible for other residents to even have electricity, will be greatly improved. For many years the quality and safety of life of residents who have power lines on their property has been diminished with no compensation.

CENSE claims that the project won't preserve or protect the quality of life in Lake Hills - this is completely false since this project will improve the quality of life of residents who have electrical wires on their property, whose life is much more affected by the project than the lives of all other residents.

In conclusion, I believe that CENSE does not take into consideration the safety of residents who have power lines on their property and who's safety will be greatly improved by this project. **Therefore I kindly request EBCC not to take CENSE petition into consideration.**

Thank you,  
Dr. Y Kravchenko

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Thursday, May 27, 2021 10:55 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Lake Hills resident shares reasons to oppose new PSE transmission lines  
**Attachments:** 21-05-27, msg to East Blv. Council on PSE transmission line.pdf

Chair Hummer and EBCC members,

I am forwarding written communication from Court Olson regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Olson or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** Court Olson <court.olson@yahoo.com>  
**Sent:** Thursday, May 27, 2021 8:18 PM  
**To:** Hummer, Betsi <BHummer@bellevuewa.gov>; Dhananjaya, Hassan <HDhananjaya@bellevuewa.gov>; Epstein, Ron <REpstein@bellevuewa.gov>; Gooding, Ross <RGooding@bellevuewa.gov>; Kasner, Steve <SKasner@bellevuewa.gov>  
**Cc:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Lake Hills resident shares reasons to oppose new PSE transmission lines

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello East Bellevue Community Council Members.

As one of your constituents, I'm writing to share my rather unique background and perspective on the transmission line project PSE proposes to put through our community. I urge you to vote against permitting it.

I'll appreciate you taking the time to read my attached letter on that subject.

Thank you.

*Court Olson*  
425-652-2777 (cell)

*My 2021 PS: If we don't act decisively today to curb GHG emissions, we will seriously affect the happiness and health of our kids' grandchildren. Their climate future is in your hands!*

27 May 2021

To: East Bellevue Community Council Members

From: R. Court Olson

RE: Lake Hills resident shares reasons to oppose new PSE transmission lines

Hello East Bellevue Community Council.

I have been a Lake Hills resident for 33 years. I'm writing because I have unique knowledge to share regarding the larger transmission lines that PSE wants to build through our area. In the following paragraphs I'll elaborate three reasons to vote against permitting this project: (A) the upsized transmission lines aren't needed, (B) they'll have negative environmental and aesthetic impacts, and (C) they'll unnecessarily increase our electric bills.

Before I expand on those three points, I want to give you some background on myself so that you might better appreciate my rather unique perspective. In closing, after covering the three points of concern mentioned above, I'd like to offer some words of caution about the project rationale that you'll likely hear from PSE, and any supporting enthusiasm City of Bellevue staff may voice.

Here are some personal background bullets to help you assess the value of my perspective.

- I have three college degrees in Civil Engineering and in Construction Management.
- I've overseen the design and construction of commercial buildings for 4 decades.
- I'm a LEED Accredited Professional, and in addition I have extensively studied energy consumption and efficiency in buildings. (This is relevant because buildings consume 80% of the energy on the power grid.)
- Over the past fifteen years I've worked with groups of professionals in the building industry and with environmental organizations to draft and pass State level energy efficiency legislation.
- Over the past six years I've actively participated in the Puget Sound Energy Integrated Resource Planning technical advisory committee and reviewed their 2017, 2019 & 2021 IRPs.
- Other than caring about how our community is served by our utility company, and how that service affects climate change, I have no personal benefit or interest in what PSE chooses to do.

Now, please allow me to elaborate on my three concerns.

(A) Bigger transmission lines aren't needed.

PSE claims that larger transmission lines are needed because of increasing electricity demand in the area. However, they've repeatedly refused to provide substantiating data for this assertion. The facts have proven otherwise.

Repeatedly, over the past decade, PSE has been forecasting rapidly rising electricity demand. However, this has never materialized. Despite significant population growth, PSE records show that

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electricity usage in the PSE service area has been very nearly flat for the past ten years. (This is also common outside of the PSE service area). There are two reasons for this flat electricity demand trend: buildings are (according to the federal Department of Energy) about 80% of the demand on the electrical grid; and, even as we build more buildings to house a growing population, on average, our buildings stock is getting more and more energy efficient and people are using less. To say this another way, the rate of population increase is being offset by the rate of increasing energy efficiency in our buildings.

Since our State Building Energy Code is required by law to tighten every three years through 2031, I expect this flat consumption trend will stay steady for at least ten years. Of course, the trend toward electric vehicles, and also the growing interest in fuel switching from gas to electric heat pumps could increase electricity demand. But, the “peak” demand, which determines how large our transmission lines need to be, can be reduced and controlled in the following three ways, at the same time that these trends evolve.

First, many PSE customers can, and likely will, install “behind-the-meter” batteries that allow the customer to go off the electric grid at peak demand times. (By the way, the batteries in electric vehicles can be hooked up and used for this purpose, too).

Secondly, PSE can and should implement “Demand Response” capabilities that would allow them to remotely trigger a shift in certain electric loads of designated industries, and also shift electric loads inside of buildings during the few daily peak hours of electricity demand. In our homes this might include off-peak scheduling of hot water heater cycling, EV charging, and, possibly, other devices.

Third, PSE could and should distribute grid linked system batteries at local power substations to help supplement the local power supply during peak demand hours in neighborhoods where rates of electricity demand growth are high.

So, you see, even with more EVs on the road, and with heat pumps slowly replacing natural gas furnaces and gas hot water heaters, in the foreseeable future we have the means and should keep “peak” demand the same as it is today. We could eventually lower it. Consequently, we don’t need to increase the size of our local transmission lines any time soon --and possibly not ever.

(B) There would be aesthetic and environmental impacts.

The upsized transmission lines proposed by PSE will have larger and taller poles, as well as added higher voltage lines between them. This will be an eye sore to people with aesthetic concerns, and present some potential health hazard to the occupants of buildings very close to or underneath such lines. Also, the transmission upsizing will require removal of about 300 trees from our beautiful tree canopy.

(C) This project will increase our electrical bills.

The laws of our state allow utilities like PSE to pass on the cost of system infrastructure enhancements to their customers. Those laws also allow the utilities to charge rate payers about a 9% profit markup on such enhancements. (This high profit margin is likely a big motivator for PSE to build this project.) If it goes forward, we can expect our electricity rates to go up.

In closing, I'd like to offer some caution about the rationale you will likely hear from PSE. They have for several years now said that this transmission line upgrade is needed because we are running out of power capacity here in Bellevue and elsewhere. Yet, when we have repeatedly asked for data to substantiate this assertion, they have refused to provide it. As stated in my concern (A), above, system wide data provided by PSE shows that the demand for electricity across the PSE service territory has remained essentially flat for more than a decade. They have provided no credible proof of their assertion that we are running low on the power transmission capability that crosses through our East Bellevue neighborhood.

The City of Bellevue staff may speak up to support the PSE transmission upgrade. If they do, it will likely be out of fear that they be blamed if the lights go out some day in the future. They have offered no data to support PSE's assertion that we are running low on power capacity either. Also, keep in mind, that PSE is a big tax payer in Bellevue and PSE corporate headquarters is right across the street from our downtown City Hall. City of Bellevue staff and our City Council have no motivation to question what PSE wants to do.

In conclusion, we, the citizens of East Bellevue, will have to pay the aesthetic and rate increase consequences if this project goes through. Neither PSE nor City of Bellevue staff will experience these impacts.

Please vote to deny the permits for this project to pass through our neighborhood. It hasn't been justified.

Thank you.

Court Olson

15817 SE 26<sup>th</sup> Street, Bellevue, WA 98008-5445

[court.olson@yahoo.com](mailto:court.olson@yahoo.com)

425-652-2777



## Pittman, Reilly

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**From:** EBCC  
**Sent:** Thursday, May 27, 2021 10:53 PM  
**To:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN  
**Cc:** Bedwell, Heidi  
**Subject:** FW: Citizen Petition to EBCC regarding Energize Eastside  
**Attachments:** ebcc-petition-2021-05-27.pdf

Chair Hummer and EBCC members,

I am forwarding written communication from CENSE regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to CENSE or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** outreach@cense.org <outreach@cense.org>  
**Sent:** Thursday, May 27, 2021 4:51 PM  
**To:** Hummer, Betsi <BHummer@bellevuewa.gov>; Dhananjaya, Hassan <HDhananjaya@bellevuewa.gov>; Epstein, Ron <REpstein@bellevuewa.gov>; Gooding, Ross <RGooding@bellevuewa.gov>; Kasner, Steve <SKasner@bellevuewa.gov>; EBCC <EBCC@bellevuewa.gov>  
**Cc:** Rick Aramburu <Rick@aramburu-eustis.com>  
**Subject:** Citizen Petition to EBCC regarding Energize Eastside

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear East Bellevue Community Council members,

Attached is a compilation of Lake Hills residents who have signed a petition stating they are opposed to Energize Eastside in Lake Hills, and requesting the EBCC work to deny its permitting. We believe this to be a small sampling of the many residents who stand opposed. Your constituents are grateful you are being called upon to evaluate and assess the justifications and claims for this project and to represent the residents in this permitting matter.

Thank you,  
CENSE Board

To: East Bellevue Community Council  
From: Petition Signers via CENSE

Dear East Bellevue Community Council (EBCC),

**We the 131 undersigned residents of Lake Hills oppose PSE's Energize Eastside transmission upgrade and ask EBCC to deny the permits for it.**

Based on years of careful research by volunteers of CENSE and industry experts, we believe Energize Eastside:

**WILL**

- destroy over 2,000 significant trees in Lake Hills and install poles 20-30 feet taller than existing poles. \*
- construct dangerous high voltage lines near aging Olympic fuel pipelines.
- raise our electricity bills for many decades.

**WON'T**

- preserve and protect the beauty or quality of life in Lake Hills.
- improve reliability of electricity for Lake Hills residents.
- increase availability of safe, clean energy for any PSE customer.

Alternatives to outdated high tension electric lines through Lake Hills are readily available.

**As our representatives we ask EBCC to preserve our quality of life and DENY PSE's permit requests for this expensive, dangerous, and unnecessary project.**

\* Our survey language contained 2 errors:

1. Tree count removal estimate too high and based on outdated information from the EIS process. PSE permit application states 1043 trees will be removed, 433 of which are classified as significant according to Bellevue LUC, which is less stringent than neighboring municipalities, for the entire North Segment.
2. Pole height increase estimate too low. PSE permit application states pole height increasing from 35-45 feet.

**Petition summary and background**

**Action petition for**

We the undersigned residents of Lake Hills oppose PSE's Energize Eastside transmission upgrade and ask EBCC to deny the permits for it.

Printed Name	Signature	Street Address	Zipcode	I live in Lake Hills	Date
ALLEN LAU		20150 <sup>th</sup> PL NE	98007	YES	5/19/2021
Melochy Calvin		110-145 <sup>th</sup> PL NE	98007	Yes	5/19/21
Alsira Putton		143 14 <sup>th</sup> PL NE	98007	yes	5/19/21
JAY MELWICK		214 145 <sup>th</sup> PL NE	98007	YES	5/19/21
Amjad Shaik		317 145 <sup>th</sup> PL NE	98007	Yes	05/19/21
Alex Roth		14709 NE 4 <sup>th</sup> PI	98007	Yes	05/19/21
VICTORIA PERM		14559 NE	98007	Yes	05/19/21
Brian Burns		14564 NE 4 <sup>th</sup> pl	98007	✓	05/19/21
Annanda Harless		14571 NE 4 <sup>th</sup> PI	98007	yes	5-19-21
Scott Harless		14571 NE 4 <sup>th</sup> PI	98007	yes	5-19-21
LEWIS SAN		14716 NE 4 <sup>th</sup> PL	98007	yes	5-19-21
Gataa		14709 NE 4 <sup>th</sup> PI.	98007	Yes	5-19-21
SHILOOT		14519 NE 4 <sup>th</sup> ST	98007	✓	5/19/21
WATSON		130-145 <sup>th</sup> AVE NE	98007	YES	5-21-21

**Petition summary and background**

**Action petition for**

We the undersigned residents of Lake Hills oppose PSE's Energize Eastside transmission upgrade and ask EBCC to deny the permits for it.

Printed Name	Signature	Street Address	Zipcode	I live in Lake Hills	Date
Alexandra Hollingsworth		14516 NE 2nd Pl	98007	yes	5-21-21
SUSAN FOX		14504 NE 2nd Pl	98007	yes	5-21-21
Hoang Vy		14504 NE 3rd St	98007	yes	5-21-21
Kenan Liu		30145th NE	98007	yes	5-21-21
JAMES H. ANDERSON		211-145th Ave NE	98007	yes	5-21-21
Ayesha Patel		141 145th Ave NE	98007	yes	5/21/21
Sim Stefasori		121 145th Ave NE	98007	yes	5-21-21
Alyssa Baylyne		14145 NE 2nd St	98007	yes	5/21/21
RAJA MATHAN		505 145th Ave NE	98007	yes	5/21/21
James Wong		576 146th Ave NE	98007	yes	5/21/21
AARON PATRICK		502 147th Ave NE	98007	yes	5/21/21
AMAN BHARDWAJ		516 147th Pl NE	98007	yes	5/21/21
Laura Smith		14701 NE 5th St	98007	yes	5/21/21

Action Network Petition Results						
Petition:			LAKE HILLS! SAY 'NO' TO ENERGIZE EASTSIDE			
Petitioner Sponsor:			CENSE - Coalition of Eastside Neighborhoods for Sensible Energy			
First name	Last name	Email	Address	City	State	Zip code
Sanjay	A	ascon2009@gmail.com	14725 NE 4th Pl	Bellevue	WA	98007
Behnaz	Abolshams	behnaz.abolshams@icloud.com	249 145th PL SE	Bellevue	WA	98007
Derek	Adelman	dadelman87@gmail.com	14516 NE 2ND PL	Bellevue	WA	98007
Krupa	Akula	ska414@live.com	14725 Ne 4th pl	Bellevue	WA	98007
Chang	An	anchang.cn@gmail.com	81 145th Pl SE	Bellevue	WA	98007
Brian	Bales	be1yog@gmail.com	13638 Southeast 5th Street	Bellevue	WA	98005
Boyang	Bao	raybao@outlook.com	14652 SE 8TH ST	Bellevue	WA	98007
Shannon	Baum	shannon_baum@comcast.net	988 137 Pl SE	Bellevue	WA	98005
stephen	baum	steve.baum@comcast.net	988 137th Pl Se	Bellevue	WA	98005
Pamela	Behan	pkdrummond@hotmail.com	13450 ne 29th place	Bellevue	WA	98005
Bharath	Boregowda	bharab@gmail.com	325 145th PL SE	Bellevue	WA	98007
Cindy	Boyer	cindyboyer@live.com	13977 SE 5TH ST	Bellevue	WA	98005
Leslie	Breckel	lsbreckel@msn.com	147 141st Place NE	Bellevue	WA	98007
Richard	Bringmann	rjb3010@gmail.com	1808 146th Ave SE	Bellevue	WA	98007
Joanne	Brown	jobrown31@comcast.net	210 145TH PL SE	Bellevue	WA	98007
Paul	Bunn	paul.bunn@gmail.com	14565 SE 3 LN	Bellevue	WA	98007
Eric	Burkholder	eburkholder42@hotmail.com	1801 136th Pl SE	Bellevue	WA	98005
Richard	Byrne	richbyrne2@msn.com	1408 143RD PL NE	Bellevue	WA	98007
Jessica	Chen	aznily503@yahoo.com	13819 we 1st street	Bellevue	WA	98005
Martha	Cross	mprocs007@gmail.com	280 145th Pl SE	Bellevue	WA	98007
Cathy	Daniels	pleezrecycle@gmail.com	15358 SE 23rd St.	Bellevue	WA	98007
Elizabeth	Daugherty	Elizahd@msn.com	2705 153rd Ave SE	Bellevue	WA	98007
Catherine	Devlieg	cdevlieg@comcast.net	13601 SE 7th ST	Bellevue	WA	98005
						deny permits to build energize Eastside in the Lake Hills neighborhood. We already have this eye sore along 148th. If you want to energize east side go ahead and put those poles along NE 84th on the west side of 405. The east side of 405 has taken the brunt of high density living and the light rail at ground level stopping traffic. In addition, another maintenance nightmare to upkeep from storms etc. If absolutely necessary than run it underground
						Of course the bigger, higher, lines and fewer trees impacts our quality of life why isn't that being prioritized? I'm absolutely no expert but it seems bigger, bulkier, uglier above ground lines (and fewer trees) is going in the opposite direction of progress. From the City's page on "Trees": "Two-thirds of all the park land in Bellevue is forested, but a majority (65 percent) of the city's tree canopy area is in suburban residential areas. The city is working to conserve existing trees..." Is this actually the case? According to the City's Tree Canopy Survey, Lake Hills Neighborhood has 31% tree canopy and the goal is 40% so why electively lose any trees that aren't absolutely necessary (let alone 2,000)?

Action Network Petition Results							Petition Sponsor: CENSE - Coalition of Eastside Neighborhoods for Sensible Energy			
Petition: LAKE HILLS! SAY 'NO' TO ENERGIZE EASTSIDE							State	Zip code	Comments	
First name	Last name	Email	Address	City	State	Zip code	Comments			
Garrett	DeVlieg	devlieg@comcast.net	13601 SE 7th St	Bellevue	WA	98005				
Brianna	DeWitt	brianna.b.price@gmail.com	2611 153rd Ave SE	Bellevue	WA	98007				
Duane	Dildine	post1284@icloud.com	261 140th Ave NE	Bellevue	WA	98005	The additional height will substantially impact our views and subsequently our			
Torrie	Dorrell	torriedorrell@yahoo.com	13634 SE 5th Street	Bellevue	WA	98005				
Stormey	Dove	stormey66@msn.com	832 150th PL SE	Bellevue	WA	98007	PSE has already done damage to our community. This must stop.			
Cynthia	Eathorne	cindyathorne@yahoo.com	273 140th Ave NE	Bellevue	WA	98005	I do not PSE transmission line!!!! Why can't these lines be buried?			
Muhammad	Faisal	deenforlife@gmail.com	14724 Ne 4th Pl	Bellevue	WA	98007	Please Consider green energy solutions			
Amy	Faith	amygfaith@yahoo.com	125210 NE 8th St. Unit D4	Bellevue	WA	98007				
Ellen	Flores	ellen.flores@outlook.com	2256 151st Pl SE	Bellevue	WA	98007				
Henry	Fritzeimer	hcfritzeimer_1@q.com	13625 SE 1st	Bellevue	WA	98005				
Steve	Funk	xfunk@comcast.net	13560 Main St.	Bellevue	WA	98005				
Marisa	Gabbert	mmarcitag@yahoo.com	15225 SE 20th ST	Bellevue	WA	98007				
Manoj	Gadkari	manojgadkari@hotmail.com	13859 SE 10TH Street	Bellevue	WA	98005				
Sandra	Gehres	SandiGehres@hotmail.com	295 145th PL SE	Bellevue	WA	98007	No benefit to PSE customers? Destroy the beauty of Lake Hills? Increases electric bills? Hear our voices and vote NO!!! Thank you!			
Eldon	Graham	eldon.graham@hotmail.com	13629 SE 20TH STREET	Bellevue	WA	98005				
Gurleen	Gulati	gurleen13@hotmail.com	13609 SE 5th St	Bellevue	WA	98005				
Orville	Gunnoe	odgunnoe@comcast.net	15243 NE 6th Street	Bellevue	WA	98007	Enough 'bamboozing' from PSE on what is "desperately needed to continue serving the eastside." Stop the desecration of East Bellevue now.			
Priyati	Gupta	namita.aggarwal26@gmail.com	15219 NE 3rd pl	Bellevue	WA	98007	I don't want any trees in lake hills area to be cut. We don't need any high bills and permits to energize Bellevue should be denied. Thanks			
Shahul	Hameed	shahul@gmail.com	145th PL NE	Bellevue	WA	98007				
Sylvia	Handjaja	shandjaja@gmail.com	13616 se 7th st	Bellevue	WA	98005				
Tyler	Hawley	thaw@uw.edu	13606 SE 5th St	Bellevue	WA	98005				
peter	He	rmjlxj@gmail.com	3404 134th Ave ne	Bellevue	WA	98005	We strongly oppose to ENERGIZE EASTSIDE			
Ann	Hendricks	aehend@gmail.com	15025 SE 20th St	Bellevue	WA	98007	I believe this is unfortunately already approved. :( But I too definitely don't like it or see justified merit!			
Erik	Hollingsworth	hollinge@gmail.com	14516 NE 2ND PL	Bellevue	WA	98007				
Yeon	Hong	ellynko68@gmail.com	14015 SE 10th St	Bellevue	WA	98007				
Sandra	Hughes	shughes@isomedia.com	1023 144th Place SE	Bellevue	WA	98007	This project is unnecessary. I believe PSE is more concerned with the profits of its investors than it is concerned with the social and financial impact of local municipalities.			
David	Jacobson	david.jacobson@gmail.com	1813 136th Place SE	Bellevue	WA	98005				

Action Network Petition Results						
LAKE HILLS! SAY 'NO' TO ENERGIZE EASTSIDE			Petition Sponsor: CENSE - Coalition of Eastside Neighborhoods for Sensible Energy			
First name	Last name	Email	Address	City	State	Zip code
Mansoor	Jafry	mansoor.spammable@gmail.com	13630 SE 1st st	Bellevue	WA	98005
cheryl	Jordan	cj_ma@hotmail.com	2200 135th pl se	bellevue	WA	98005
How	Jou	howardatbellevue69@gmail.com	208 142nd ave NE	Bellevue	WA	98007
Peter	Justus	pgjustus@gmail.com	13610 SE 5th St.	Bellevue	WA	98005
Jamie	Kim	jamiekimmd@gmail.com	928 137TH PL SE	Bellevue	WA	98005
Alex	Kim	cho.jinsun@gmail.com	158 154th Pl Ne	Bellevue	WA	98007
Katherine	Kratzer	katherine.kratzer@gmail.com	505 147th Pl NE	Bellevue	WA	98007
Eric	Landgraf	eland79@gmail.com	2568 154TH AVE SE, .	Bellevue	WA	98007
Mindy	Leffler	mindy_lef@hotmail.com	15210 NE 4th Pl	Bellevue	WA	98007
R	Lemus	mrslemus@live.com	207 145th PL NE	Bellevue	WA	98007
Juan	Liu	amyjuancy@hotmail.com	2045 152nd Ave se	Bellevue	WA	98007
Jim	Loring	jmsloring@gmail.com	18115 153rd AVE SE	Bellevue	WA	98007
tzuyu	lu	sssggg@gmail.com	14409, Se 8th St	Bellevue	WA	98007
DeShay	McCluskey	deshaygould@hotmail.com	868 137th pl SE	Bellevue	WA	98005
Scott	McNair	sdminseattle@gmail.com	13616 SE 7th Street	Bellevue	WA	98005
Kristen	Miyakawa	kristenmiy@comcast.net	14229 se 23rd street	Bellevue	WA	98007
GHOUSE	MOHIUDDIN	ghouse_m@live.com	20 145TH PL NE	Bellevue	WA	98007
thomas	moran	moranta@blarg.net	13908 se 3rd pl	Bellevue	WA	98005
Rafael	Munoz-Cintron	munozcintron@hotmail.com	13848 SE 10th Street	Bellevue	WA	98005
Moonlight	Ning	jight598007@gmail.com	208 142 ave NE	Bellevue	WA	98007
Elizabeth	Olson	beth@marcolson.net	13809 SE 20th St	Bellevue	WA	98005
PATRICIA	OPPENHEIM	paogarbage@comcast.net	13656 MAIN ST	Bellevue	WA	98005
Ami	Pilon	ampilon@aol.com	15214 NE 8th St. #G-21	Bellevue	WA	98007
L	Prior	prior.bbd@outlook.com	13606 SE 3rd PL	Bellevue	WA	98005

Action Network Petition Results						
LAKE HILLS! SAY 'NO' TO ENERGIZE EASTSIDE			Petition Sponsor: CENSE - Coalition of Eastside Neighborhoods for Sensible Energy			
First name	Last name	Email	Address	City	State	Zip code
Christopher	Randels	cr.randels@gmail.com	2501 148th Ave SE	Bellevue	WA	98007
Dheeraj	Rutia	dheerajrutia@yahoo.com	13685 SE 2nd St	Bellevue	WA	98005
Irfan	Saleem	irfan_ms@yahoo.com	208, 145th Pl NE	Bellevue	WA	98007
Mary	Schmidt	maryjschmidt@yahoo.com	758 154TH PL NE	Bellevue	WA	98007
Ken	Schmidt	tigg073114@gmail.com	758 154th Place Northeast	Bellevue	WA	98007
Marilyn	sexton	mistym4ever@yahoo.com	15402 SE 25th St	Bellevue	WA	98007
Shiwei	Shen	swshen66@yahoo.com	126 145th Place NE	Bellevue	WA	98007
Payman	Shirpay	paymanshirpay@gmail.com	145th Pl SE	Bellevue	WA	98007
Hannah	Sim	simh1112@gmail.com	928 137th Pl SE	Bellevue	WA	98005
Victoria	Simonnet	vicrodhome@yahoo.com	15214 SE 18th St.	Bellevue	WA	98007
Kate	Sinon	ksinon27@gmail.com	2562 155th Ave SE	Bellevue	WA	98007
Jon	Skoog	jon@hotmail.com	1640 151st Av SE	Bellevue	WA	98007
Michele	Stanelun	midsophist@gmail.com	2615 145th AVE SE	Bellevue	WA	98007
Kay	Stotesbery	kayst099@comcast.net	15210 NE 8th Street, Apt. D-4	Bellevue	WA	98007
Suzanne	Strom-Reed	stromsie@msn.com		Bellevue	WA	98007
Faheed	Subhani	faheed@live.com	423 145th Ave NE	Bellevue	WA	98007
Nasreen	Sultana	juveria05@yahoo.co.in	208 145th pl NE	Bellevue	WA	98007
Mary	Tacher	maryt@tacher.com	227 140th Ave NE	Bellevue	WA	98005
Tom	Tameishi	tom.tameishi@gmail.com	13703 SE 3rd Place	Bellevue	WA	98005
Vladimir	Tankovich	vtankovich@yahoo.com	14781 ne 3rd st, apt 22	Bellevue	WA	98007
Lauren	Tea	tea8@comcast.net	311 145TH PL NE	Bellevue	WA	98007
Jingmeng	Tian	tianjingmeng@gmail.com	13608 SE 7th St	Bellevue	WA	98005
Xiao	Tong	winwin_tong@hotmail.com	145th pl ne	Bellevue	WA	98007
Karen	Tsang	karentsang123@hotmail.com	78 145th Pl SE	Bellevue	WA	98007
Joni	Vanderburg	joni.vanderburg@gmail.com	2644 153rd Ave SE	Bellevue	WA	98007
Maria	Vlachopoulou	mariaserios@hotmail.com	14708 SE 15TH PL	Bellevue	WA	98007



Action Network Petition Results							
LAKE HILLS! SAY 'NO' TO ENERGIZE EASTSIDE			CENSE - Coalition of Eastside Neighborhoods for Sensible Energy				
Petitioner:	Address		City	State	Zip code	Comments	
First name	Last name	Email	Address	City	State	Zip code	
Jeanne	Warne	jeanne.warne@comcast.net	13608 NE 36th Pl	Bellevue	WA	98005	This proposed project is not needed and very destructive to our neighborhood. It will affect property values and quality of life here in Bellevue. Even PSE reports that demand has not increased as expected. There is newer and better technology available should demand increase. Please do not grant this unnecessary permit!
Patricia	WILLIAMS	pattigwill@gmail.com	13606 Southeast 5th Street	Bellevue	WA	98005	
Michiel	Wories	mworries@outlook.com	106 136th Ave SE	Bellevue	WA	98005	
YaoYao	Zhang	yaoyaozhang.ca@gmail.com	81 145th Pl SE	Bellevue	WA	98007	Very ugly super tall poles that do not belong in beautiful Bellevue!

## Pittman, Reilly

---

**From:** EBCC  
**Sent:** Thursday, May 27, 2021 10:51 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Energize Eastside Eastside Bellevue public comment  
**Attachments:** Energize Eastside Land Use Public Comment.docx

Chair Hummer and EBCC members,

I am forwarding written communication from Lara Prior regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Ms. Prior or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

---

**From:** Lara Prior <lara.prior@outlook.com>  
**Sent:** Thursday, May 27, 2021 4:51 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Energize Eastside Eastside Bellevue public comment

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

13606 SE 3<sup>rd</sup> PL  
Bellevue, WA 98005  
May 27, 2021

Dear East Bellevue City Council,

I am writing you ask that you reject the requested permits by PSE in Bellevue for the Energize Eastside project.

I believe this project will be unsafe due to the proximity to fuel pipelines, have a detrimental impact on the environment, trees and wildlife. I believe this project will increase exposure to harmful radiation and put citizen's health at risk.

The current voltage is considered medium this project would increase to a very high transmission, one that could be considered harmful to human health.

Based on years of careful research by volunteers of CENSE and industry experts, I believe Energize Eastside:

WILL

- destroy over 2,000 significant trees in Lake Hills and install poles 20-30 feet taller than existing poles.

- construct dangerous high voltage lines near aging Olympic fuel pipelines.
- raise our electricity bills for many decades.

WON'T

- preserve and protect the beauty or quality of life in Lake Hills.
- improve reliability of electricity for Lake Hills residents.
- increase availability of safe, clean energy for any PSE customer.

I urge the East Bellevue City Council to protect the homeowners in this community we call home.

Sincerely,

Lara Prior

Homeowner in Bellevue for 10 years in Glendale.

13606 SE 3<sup>rd</sup> PL  
Bellevue, WA 98005  
May 27, 2021

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I am writing you to ask that you reject the requested permits by PSE in Bellevue for the Energize Eastside project.

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The current voltage is considered medium this project would increase to a very high transmission, one that is considered harmful to human health.

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WILL

- destroy over 2,000 significant trees in Lake Hills and install poles 20-30 feet taller than existing poles.
- construct dangerous high voltage lines near aging Olympic fuel pipelines.
- raise our electricity bills for many decades.

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- preserve and protect the beauty or quality of life in Lake Hills.
- improve reliability of electricity for Lake Hills residents.
- increase availability of safe, clean energy for any PSE customer.

I urge the city of Bellevue to protect the homeowners in this community we call home.

Sincerely,

Lara Prior

Homeowner in Bellevue for 10 years in Glendale.

## Pittman, Reilly

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**Sent:** Thursday, May 27, 2021 10:49 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: CENSE comment for June 1 Energize Eastside meeting  
**Attachments:** Energize Eastside in East Bellevue.pdf

Chair Hummer and EBCC council members,

I am forwarding written communication from Don Marsh/CENSE regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Mr. Marsh/CENSE or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

---

**From:** donmarsh@cense.org <donmarsh@cense.org>  
**Sent:** Thursday, May 27, 2021 4:18 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** CENSE comment for June 1 Energize Eastside meeting

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear East Bellevue Community Council members,

Attached is a written comment from the non-profit citizen organization CENSE regarding PSE's Energize Eastside project. We have spent many years studying PSE's proposal, and we hope our findings will help inform you about critical issues as you prepare for the CUP process.

We are sorry that PSE's choices have required you and the public to dive into the gritty details of this complex regional energy project. We would have preferred these questions to be considered by a state agency whose professional planners and engineers would have considered the merits of the proposal, applying their knowledge of energy infrastructure and siting criteria.

However, this is the situation we are in, and we are grateful that you will be representing the needs, concerns, and aspirations of your constituents in this matter.

Best regards,

Don Marsh  
President, CENSE.org



Coalition of Eastside Neighborhoods  
for Sensible Energy

May 27, 2021

# Energize Eastside in East Bellevue

## Executive Summary

“Energize Eastside” is Puget Sound Energy’s 2013 proposal to install a new transformer and 16 miles of higher-voltage transmission lines through residential neighborhoods in Bellevue, Newcastle, Renton, and Redmond. The cost is likely to exceed \$200 million. PSE says the purpose of the project is to avoid rolling blackouts on a very cold or very hot day if multiple equipment failures hobble the Eastside grid.

### **Is the project needed?**

NO. PSE justifies the project by assuming an unlikely scenario of coincident crises that lead to system overloads. But such a scenario has never happened. Given PSE’s extreme assumptions, the chance of this kind of overload is one-in-a-million for at least 20 years.

### **Does the project reduce greenhouse gas emissions?**

NO. Currently most of PSE’s electricity is generated by burning coal and gas. While the state’s Clean Energy Transformation Act requires PSE to transition to renewable energy resources in coming years, the Energize Eastside transmission lines would not connect customers to new sources of clean energy. Even as we electrify our economy, peak demand can be kept at reasonable levels by using smart energy technologies and policies. This approach would retain thousands of urban trees which absorb carbon and provide many other benefits.

### **Is the project safe?**

The project increases safety risks due to higher voltages, a narrow utility corridor, and the proximity of two petroleum pipelines. Energize Eastside would require new holes to be excavated within feet of the 50-year-old pipelines. Minor damage to a pipeline could spark a liquid fuel fire that the Bellevue Fire Department categorizes as “catastrophic.” Bellevue does not have the ability to extinguish such a fire.

### **Why would PSE pursue such a costly project?**

The state of Washington provides a 9.8% annual return on investment for utility infrastructure projects, motivating PSE to put more “steel in the ground.” Who pays? PSE’s customers. For a \$200 million project, customers would pay \$20 million per year, possibly for 50 years or more.

### **What is prudent action for EBCC?**

Energize Eastside is an expensive, outdated, risky project that harms our communities and the environment. **CENSE asks council members to reject PSE’s permits to build the project.**

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## Know your utility

It is difficult to understand Energize Eastside without understanding the motivations of the company promoting it. Many residents are inclined to give PSE the benefit of the doubt. They say, “PSE is just a local company, right? Isn’t Energize Eastside necessary to prevent devastating blackouts? Doesn’t PSE want what’s best for their customers?”

The answers are: no, no, and no.

### PSE’s motivations

Before 2009, PSE was wholly owned by American shareholders. That changed soon after Congress and the George W. Bush administration rescinded a key provision of the Public Utility Holding Company Act of 1935.<sup>1</sup> The old law made foreign ownership of American utilities extremely difficult. Just a year after Bush signed the Energy Policy Act of 2005, Australian and Canadian investors announced their intent to buy PSE. When Washington’s Utility and Transportation Commission approved the sale in 2009, PSE became the first foreign-owned utility west of the Mississippi.<sup>2</sup>

PSE’s investors aren’t celebrating the company’s financial performance since the acquisition. Revenues have been declining for at least a decade, and the COVID-19 pandemic exacerbated that trend. The graph below shows PSE’s revenues as reported in annual 10-K reports to the SEC, adjusted for inflation:

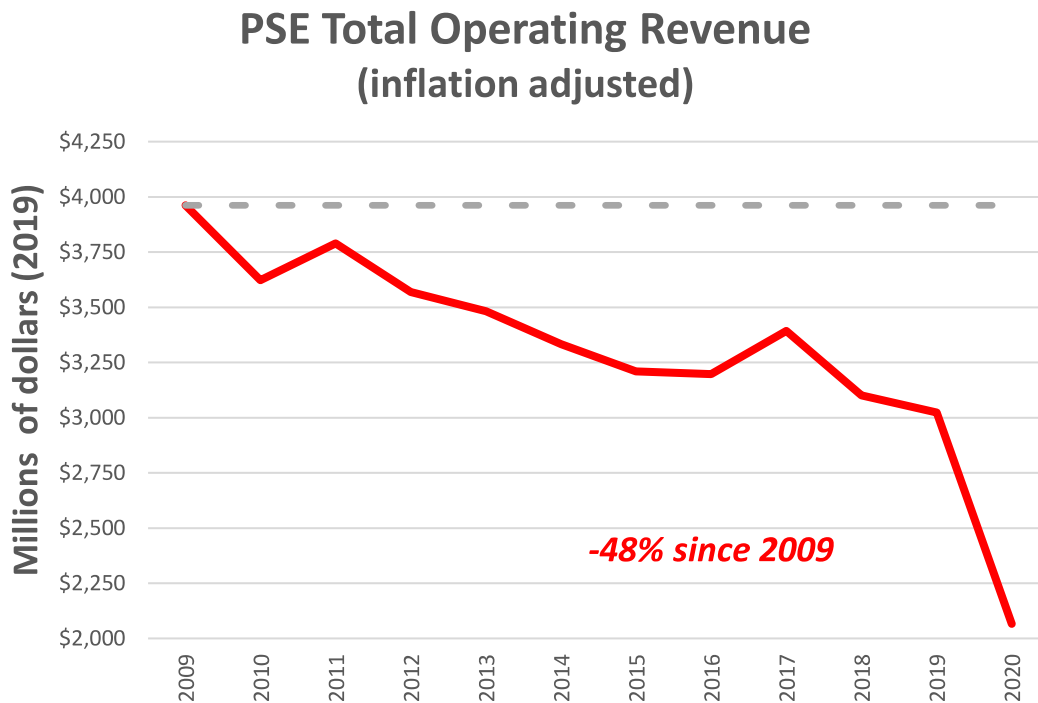


Figure 1 – Revenue has declined since PSE was sold to investors in 2009

<sup>1</sup> <https://www.everycrsreport.com/reports/RL33739.html>

<sup>2</sup> <https://www.naturalgasintel.com/7-4b-deal-to-privatize-puget-sound-energy-gets-final-ok/>



PSE’s customers have been reducing consumption to save money and lessen environmental impacts. PSE can’t boost revenues by encouraging customers to consume more of its main products, electricity and natural gas. The company can’t increase profits by cutting costs or increasing prices, because PSE is a state-regulated monopoly.

However, PSE does have an effective way to increase revenues, as noted by renowned energy analyst David Roberts:<sup>3</sup>

*[A] utility makes money not primarily by selling electricity, but by making investments and receiving returns on them. If it builds more power plants and power lines, it makes more money.*

In the early 20<sup>th</sup> century, Washington offered utilities an attractive annual return of nearly 10% to build generation plants and transmission lines. The government wanted every community in the state to have electricity. Even after that goal was reached, the incentives were never changed. The high rate of return is funded through rate increases approved by the state’s Utility and Transportation Commission (UTC). High returns and relatively low risks make utilities like PSE an attractive investment for risk-averse investors like pension funds.

The size of the infrastructure revenue opportunity surprises observers the first time they learn about it. If Energize Eastside is built for a cost of \$200 million, PSE can recover about 10% of that cost every year for the lifetime of the project – 50 years or more. The revenue would be about \$20 million per year. In 50 years, that would total over ONE BILLION dollars. Even PSE customers living far from the Eastside would pay that cost.

Another surprise is that PSE has already spent \$90 million on Energize Eastside, even though the company hasn’t secured all the permits it needs to begin construction.<sup>4</sup> If PSE doesn’t complete the project, this expense can’t be levied on customers. The expense would fall to its investors. That may explain why PSE continues to pursue the project, even though the previously predicted need for the project has evaporated, and attractive technologies to power the Eastside’s energy future have become cost effective.

7	Eastside Transmission Project	88,876,253
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Figure 2 – Federal reporting shows total cost of Energize Eastside to date

<sup>3</sup> Entertaining overview of utility infrastructure incentives: <https://grist.org/climate-energy/utilities-for-dummies-how-they-work-and-why-that-needs-to-change/>

<sup>4</sup> Costs expended on Energize Eastside to date are reported in PSE’s annual Form 1 report to the Federal Energy Regulatory Commission. See <https://elibrary.ferc.gov/eLibrary/filedownload?fileid=15772184>, page 216

## PSE's methods

Energize Eastside's 16-mile transmission lines cross the jurisdictions of four cities as well as the East Bellevue Community Council. Under most circumstances, a regional energy project would be evaluated and approved by the state's Energy Facility Site Evaluation Council (EFSEC). EFSEC "provides a 'one-stop' siting process for major energy facilities in the State of Washington... EFSEC also manages an environmental and safety oversight program of facility and site operations."<sup>5</sup> Once EFSEC approves the project, no local government can impede its construction.

Instead of asking EFSEC to evaluate the project, PSE employed a political and marketing campaign driven by land use codes and political pressure rather than a technical case based on hard facts.

This approach would require PSE to apply for five local permits (one for the north part of Bellevue, which requires additional approval from the East Bellevue Community Council, one for the south end of Bellevue, and one each from Newcastle, Renton, and Redmond).

The downside of PSE's chosen strategy is the expense and burden placed on city staff and councils to evaluate a very large and complex infrastructure project. Many people assume the UTC will provide a final review of Energize Eastside, but that is incorrect. The UTC's authority is confined to deciding whether PSE can raise rates to pay for Energize Eastside **after it is built** – after damage to communities and the environment has already occurred. The UTC has rarely denied PSE recovery of its infrastructure investments.

Why would PSE choose this piecemeal permitting approach, which has taken years, when a much shorter review by EFSEC based on the technical merits of the proposal would have settled the question once and for all?

To sell Energize Eastside to the public and local decision makers, PSE was attracted by the claims of PRW Communications, a PR firm specializing in the approval of controversial utility projects. PSE hired Mark Williamson, chairman of PRW to deploy overtly political techniques described in this summary on the PRW website:

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<sup>5</sup> <https://www.efsec.wa.gov/>

## PRW'S PROCESS

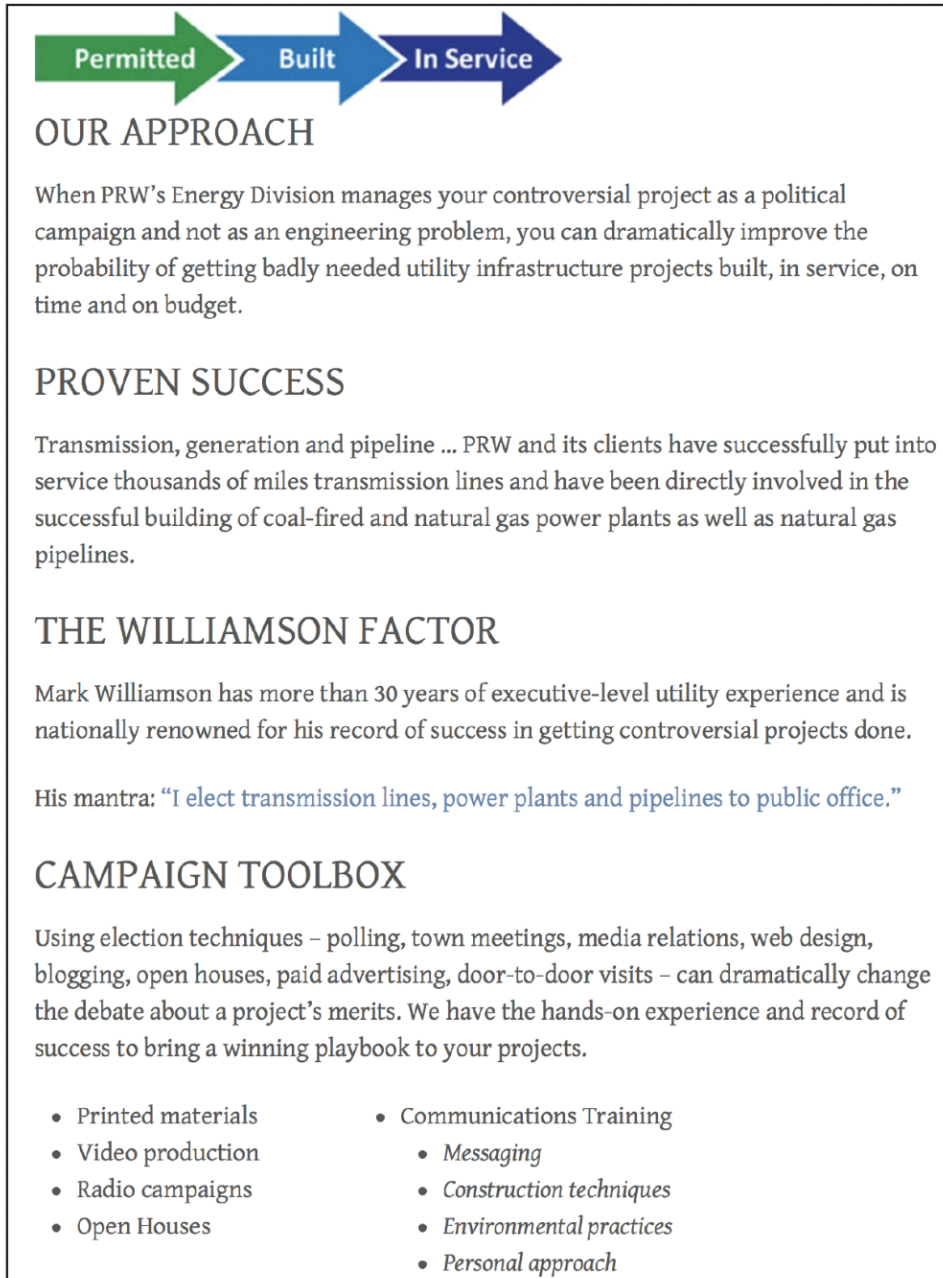


Figure 1 – The Energize Eastside marketing strategy is described on PRW's website

In 2014, PSE unleashed all the tools in Williamson's toolbox: printed materials, radio campaigns, and open houses. The public meetings became opportunities for PSE to market its project to skeptical residents rather than engaging with the community and answering reasonable questions.

For years, Eastside residents have been barraged by advertisements in Eastside newspapers featuring health care providers and emergency responders expressing concern about the Eastside's obsolete electric grid. The photos of these purported spokespeople are often stock images available from visual media companies.

This 2014 ad in the Bellevue Reporter shows a stock photo of a nurse from Getty Images:<sup>6</sup>

**We can't protect the Eastside's future with yesterday's electric grid**

The Eastside's electric grid was last upgraded in the 1960s — not for today's fast-growing communities and the 21st-century emergency services they must rely on. Without substantial upgrades soon, we risk more disruptive and longer power outages. To protect our future, PSE is working with Eastside communities on a safe, reliable solution. Learn more at [pse.com/energizeeastside](http://pse.com/energizeeastside)

[pse.com/energizeeastside](http://pse.com/energizeeastside) PSE PUGET SOUND ENERGY

Figure 2 – PSE used stock image models to promote Energize Eastside in local media

<sup>6</sup> <https://www.istockphoto.com/photos/black-nurses> (photo number 4)

## Is Energize Eastside needed?

According to PSE, Energize Eastside is needed to avoid rolling blackouts on a very cold or very hot day if multiple simultaneous equipment failures hobble the normal capacity of the Eastside grid. If pressed, PSE will admit this isn't a common occurrence. PSE might even concede that this kind of power outage has never happened before. PSE can't say that it will ever happen, but the company says it must comply with federal reliability requirements.

But there are many missing details council members must understand to effectively review Energize Eastside (with EFSEC and the UTC on the sidelines). Fortunately, a degree in electrical engineering isn't required to make a good decision. The "burden of proof" rests on the project applicant, and the basis of evaluation is established in Bellevue LUC section 20.20.255.D.2(c). According to this code, the applicant shall:<sup>7</sup>

- i. Describe whether the electrical utility facility location is **a consequence of needs or demands from customers located within the district or area**; and*
- ii. Describe whether the operational needs of the applicant require **location of the electrical utility facility in the district or area**.*

### PSE's one-in-a-million scenario

PSE's advertising promotes the public perception that widespread rolling blackouts are just around the corner. However, the unprecedented set of simultaneous crises that PSE claims it must be prepared to resolve are unlikely to happen in the foreseeable future and go far beyond federal standards. The conditions that would lead to rolling blackouts are documented in PSE's 2013 *Eastside Needs Assessment Report*:<sup>8</sup>

1. Extremely high demand for electricity occurs during a very cold or very hot day.
2. Two of the four 230 kV transformers serving the Eastside fail.
3. Peak demand grows at 2.4% per year, approximately twice the rate of population growth.
4. Huge amounts of electricity are simultaneously being transmitted to Canada or California.
5. Almost 2/3 of nearby generation plant capacity is inexplicably offline.
6. An additional problem, such as a falling power pole, occurs.

Federal reliability standards, as set by the North American Electric Reliability Corporation (NERC), require a utility's emergency response plans to avoid power outages when two essential components fail during hours of maximum yearly demand for electricity.<sup>9</sup> The first two items in the above list address this requirement.

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<sup>7</sup> <https://bellevue.municipal.codes/LUC/20.20.255>

<sup>8</sup>

[https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside Needs Assessment Final Draft 10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf)

<sup>9</sup> <https://www.nerc.com/files/TPL-001-4.pdf>, see case P3 on page 9

However, the next four conditions in PSE's list are unlikely to occur simultaneously with the first two and aren't called for in NERC planning standards. Although it's desirable to have an energy grid that would continue to operate in every possible set of concurrent emergencies, that would be expensive for ratepayers, dangerous for residents, and damaging to the environment. We don't design infrastructure for every possible emergency. For example, we don't design ten-lane highways to avoid a possible traffic jam if a Seahawks game happens at the same time as a big political rally amid a raging snowstorm. Avoiding an uncomfortable jam in these unlikely circumstances isn't worth spending hundreds of millions of dollars and bulldozing homes and parks.

PSE falsely cites NERC standards to justify an expensive fix for a nearly non-existent problem, but then disregards NERC requirements to update studies more than five years old:<sup>10</sup>

*2.6. Past studies may be used to support the Planning Assessment if they meet the following requirements:*

*2.6.1. ... the study shall be **five calendar years old or less**, unless a technical rationale can be provided to demonstrate that the results of an older study are still valid.*

*2.6.2. ... **no material changes have occurred** to the System represented in the study. Documentation to support the technical rationale for determining material changes shall be included.*

To fulfill requirement 2.6.1, PSE must upgrade studies completed in 2013 and 2015 that establish the need for the project.

To fulfill requirement 2.6.2, PSE must argue that no material changes have occurred since the original studies were published. PSE must provide technical documentation that shows: 1) the Eastside's peak demand is continuing to grow at the pace PSE predicted in 2015; and 2) there continues to be a need to serve the winter peak loads outlined in the original project proposal. To date, PSE has refused to release the data that would inform the public as to whether either of these conditions exists. However, PSE's 2021 Integrated Resource Plan shows dramatic changes in actual demand trends, PSE's forecasts for future growth, and resources the company will acquire to meet legislated clean energy requirements.

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<sup>10</sup> <https://www.nerc.com/files/TPL-001-4.pdf>, p. 4

## Inaccurate forecasts

Is the Eastside’s demand for electricity growing at such a vigorous rate that it will soon overwhelm the capacity of existing transformers and transmission lines? PSE refuses to answer. In 2015, PSE published the following graph showing that Eastside customer demand would exceed its system capacity on a very cold day in winter in by 2018. This dire prediction has not come to pass.

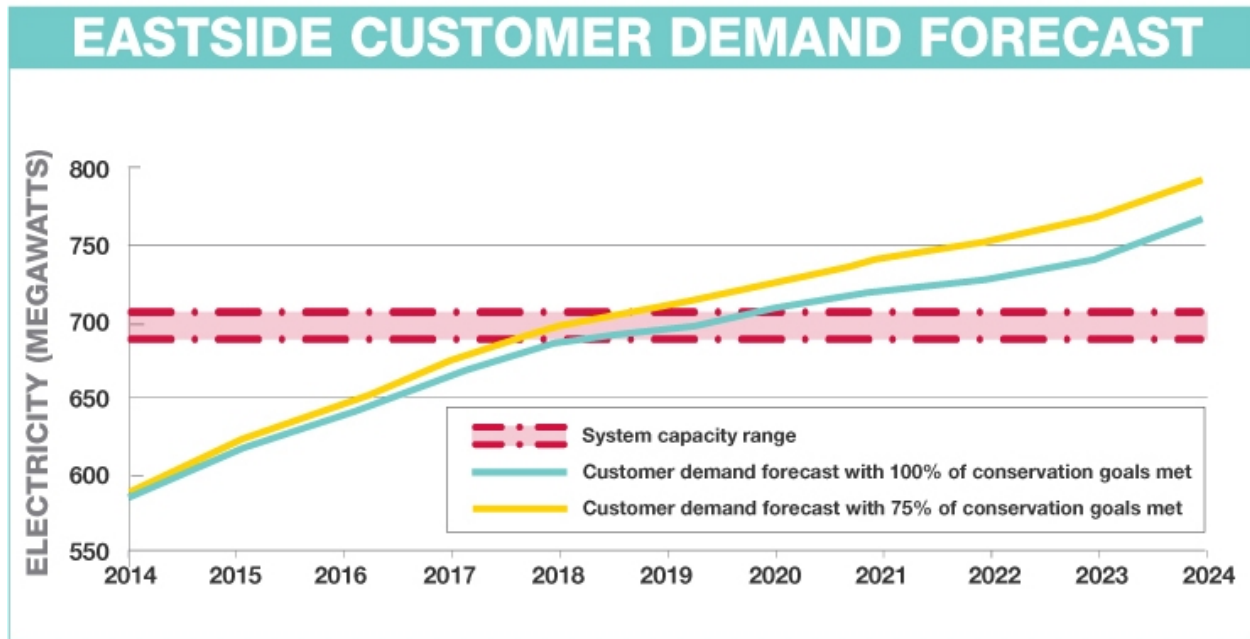


Figure 3 – PSE publishes a graph showing a need for Energize Eastside in 2015

The graph is designed to raise concerns about the reliability of our electric service. PSE did not explain that the red “system capacity” line depicts drastically reduced system capacity caused by the multiple, simultaneous emergencies described above. Many people and business leaders thought the graph showed an electric grid on the verge of failure under normal daily conditions. PSE did little to dissuade this interpretation.

PSE also did not explain why the forecast of customer demand grows at twice the rate of the Eastside’s population growth. This strains plausibility. PSE has a long history of aggressive demand forecasts predicting growth that never materialized. PSE’s state regulator, the UTC, has criticized PSE’s inflated forecasts on multiple occasions. The UTC questioned this forecast as well.<sup>11</sup>

<sup>11</sup> The Commission questions “the effect of lower load assumptions on the need for Energize Eastside Project.” See <https://cense.org/wp-content/uploads/2021/05/utc-final-acknowledgment-160918-99-pse-irp.pdf>, p. 10

The following chart illustrates the challenge PSE has had in accurately forecasting peak demand. The dashed lines show PSE’s peak demand forecasts included in its 2013, 2015, 2017, and 2021 Integrated Resource Plans. Each succeeding plan has lowered the forecast compared to the one before.

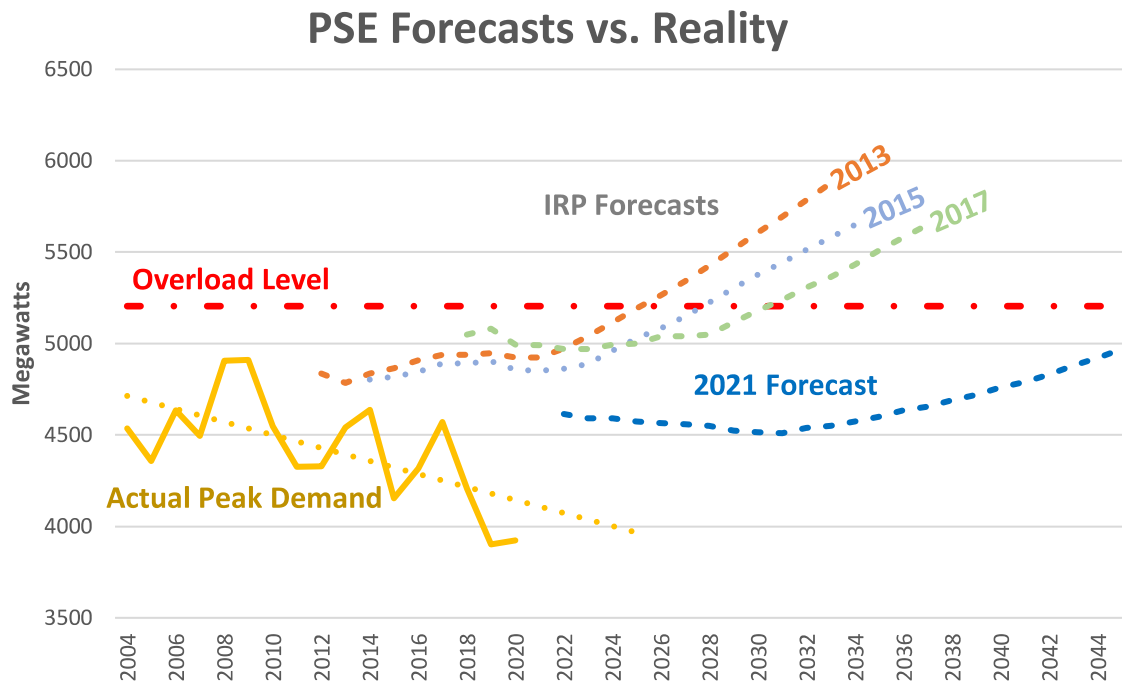


Figure 6 – PSE’s demand forecasts diverge from actual peak demand

The 2013 Integrated Resource Plan contained the forecast that informed the need for Energize Eastside when the project was first announced. As noted in the chart, PSE expected demand to exceed an “Overload Level” by 2026. This critical level of 5,200 MW was described in the first Energize Eastside report released in 2013.<sup>12</sup>

Each successive forecast postponed the risk of overload, until the latest forecast in PSE’s 2021 Integrated Resource Plan no longer reaches the critical level in the next quarter-century. Given the company’s record of inaccurate forecasts, we have reason to doubt the accuracy of the new forecast, especially when actual measured peak demand has been declining for more than a decade.<sup>13</sup>

Declining demand is partly due to warming winter temperatures in the Puget Sound region. Other causes for lower demand include technology advances like LED lighting, smart thermostats, high

<sup>12</sup> “Even if 100% conservation is achieved, under extreme weather conditions PSE could exceed the 5,200 MW level during the winter 2013-14.” See [https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside\\_Needs\\_Assessment\\_Final\\_Draft\\_10-31-2013v2REDACTEDR1.pdf](https://energizeeastside2.blob.core.windows.net/media/Default/Library/Reports/Eastside_Needs_Assessment_Final_Draft_10-31-2013v2REDACTEDR1.pdf), p. 9

<sup>13</sup> Actual peak demand figures were found in PSE’s annual Form 1 reports to the Federal Energy Regulatory Commission on page 401b, line 40, column d. FERC reports are available from <https://elibrary.ferc.gov/eLibrary/search>.



efficiency heat pumps, and appliances that use a fraction of the electricity required by their predecessors.

In 2016, PSE vice president Andy Wappler appeared in a YouTube video to promote Energize Eastside.<sup>14</sup> In the video, Mr. Wappler admits that “new technologies and significant conservation have reduced energy consumption,” but “these lines need to be replaced.” Although PSE replaced aging poles and wires about ten years ago, Wappler implies that the only way they can be fixed is by doubling the voltage.



*Figure 7 – PSE’s Andy Wappler says, “These lines need to be replaced.”*

Beginning in 2017, CENSE asked PSE to publish actual Eastside demand figures so the public could see whether PSE’s predicted trend was occurring. PSE demurred, claiming the data was “Critical Energy Infrastructure Information” (CEII) that could not be released due to the threat of terrorism. PSE’s insistence on secrecy is unusual; utilities like Seattle City Light, Tacoma Power, and ConEd in New York shared peak demand data with little concern that the information would encourage terrorism.

Nonetheless, Don Marsh, president of CENSE, obtained CEII security clearance from the Federal Energy Regulatory Commission to access PSE’s data. But PSE still refused to cooperate. PSE claimed there was no need for Mr. Marsh or professional consultants hired by CENSE to see this data, because PSE’s consultants had already completed multiple studies establishing the need for the project.

In the first Bellevue land use hearing for Energize Eastside held in March 2019, PSE unexpectedly announced that the company’s main concern now focused on summer peak demand – not the winter peak demand cited in its permit application, consultant studies, the EIS, and most of its advertising.

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<sup>14</sup> <https://youtu.be/ryNAEqSUV8>

PSE has never published data showing how the Eastside’s summer demand is evolving or how it might change in the future.

The sudden change in the project’s purpose has enormous consequences. The change in seasonal need affects the operating parameters, the size of the project, and even what kind of technology best matches the need. For example, the EIS focuses on winter peak loads and disqualifies solar panels with this explanation:

*Solar could help reduce summer peak loads but because additional capacity would continue to be needed for winter, the use of solar generation to address the transmission capacity deficiency would need to be matched by winter generation capacity and therefore would be redundant.*<sup>15</sup>

Now, given that the primary purpose of Energize Eastside has changed to serving a summer peak emergency, the use of solar panels to reduce summer loads should be fairly evaluated.

Battery storage is another useful technology that was not evaluated to serve an emergency scenario occurring only in the summer. PSE’s battery consultant admits that “peak energy demand also shifted from winter to summer” in a 2018 study entitled *Eastside System Energy Storage Alternatives Assessment*.<sup>16</sup> However, no significant changes were made to a battery design proposed in 2015 that attempted to resolve both summer and winter emergencies. Attempting to address two very different scenarios with one design produced a system that would be inefficient, oversized, and too expensive to take seriously. However, a battery designed to serve a summer-only scenario could offer a very attractive alternative to Energize Eastside.

We believe a combination of solar panels, batteries, and other smart technologies could serve the Eastside’s energy future for less cost, less risk, and less impact on communities and the environment than Energize Eastside.

### Better reliability?

The system that delivers electricity to Eastside homes and businesses has four parts:

1. Generation plants powered by wind, water, sun, and fossil/nuclear fuels are usually located hundreds of miles from the Eastside.
2. High-voltage transmission lines operating at 500,000 volts or more carry the electricity over long distances. Large transformers convert the electricity to lower voltages that are safer to operate in urban areas. The transmission lines in PSE’s current corridor operate at 115,000 volts.
3. Neighborhood substations further reduce voltage to 12,500 volts. This lower-voltage electricity is carried on distribution lines frequently seen in most Eastside neighborhoods.
4. Distribution wires connect to small transformers that power 110-volt and 220-volt electric sockets in our homes.

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<sup>15</sup> [http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/02\\_chapter\\_2\\_project\\_alternatives.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/02_chapter_2_project_alternatives.pdf), p. 2-39

<sup>16</sup> <https://energizeeastside2.blob.core.windows.net/media/Default/AbouttheProject/PSE-EE-Eastside-System-Energy-Storage-Alternatives-Assessment.pdf>

Energize Eastside would increase the capacity of high-voltage transmission lines and transformers mentioned in item #2 of the above list. Will this reduce the number or duration of power outages that customers endure on the Eastside? To find out, CENSE analyzed PSE’s Electrical Reliability reports to the City of Bellevue over the past decade. The following graph shows the duration and number of outages that affected at least 100 customers.

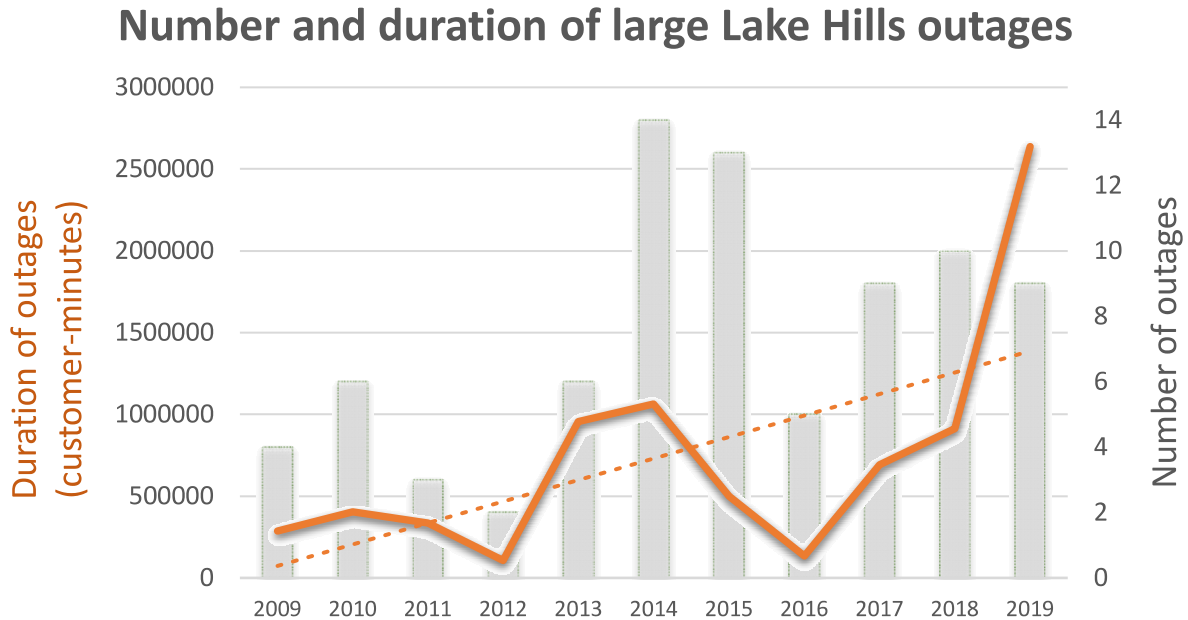


Figure 8 – Lake Hills power outages have worsened in the last decade

Both the total duration of large outages (shown by the solid orange line) and the number of outages (gray bars) have gotten worse in Lake Hills during the past decade. However, almost all these outages were caused by failures of **distribution wires** or **substation equipment** (items in #3 of our list). Exactly zero outages were caused by conditions resembling the crisis scenario PSE proposes to fix with Energize Eastside. This project is unlikely to prevent any future outages.

Had PSE invested \$90 million in modern technology to address long-standing reliability issues in many neighborhoods, rather than pursuing the Energize Eastside project to fix imagined problems, many customers might have enjoyed improving reliability during the past decade.

## Would Energize Eastside be safe?

In May 2021, the Olympic Pipeline Company excavated a section of a pipeline that runs under Bellevue's Somerset neighborhood. Several large tree stumps growing over the pipeline were removed, and the pipeline was carefully inspected to make sure tree roots had not compromised the protective coating. Neighbors appreciated the caution demonstrated by the workers. An inspector from the UTC monitored the process every day, ensuring all safety guidelines were observed. The project took almost twice as long as initially estimated.



*Figure 9 – Excavation of the Olympic Pipeline in Somerset, May 2021*

In the current utility corridor, PSE's transmission lines are co-located with one or two pipelines that transport 18 million gallons of jet fuel, gasoline, and other liquid fuels each day. Although the pipelines appear to be adequately maintained and inspected by Olympic, the pipes are fifty years old. Over the years, their locations have shifted in the corridor.

If Energy Eastside is approved, PSE contractors, rather than OPL employees, will be responsible for excavation near the pipeline. Residents worry that these contractors might accidentally strike a pipeline as they dig foundations for new power poles within feet of the pipelines. A minor nick might go unnoticed, but the weakened pipeline could develop a significant leak years after construction is complete. A small scratch in the pipeline coating can lead to accelerated corrosion due to electromagnetic fields emitted by the transmission lines, heightening the danger of a breach.

According to the Bellevue Fire Department, a pipeline breach could release hundreds of thousands of gallons of liquid fuel that would flow downhill. In East Bellevue, the clubhouse of the Glendale Country Club would be at risk. Approximately 2½ miles south of the clubhouse, the pipeline passes ten times closer to Tyee Middle School than California safety codes would allow.<sup>17</sup> Another 2½ miles south, the Newcastle City Hall is also close – and downhill – from the pipelines.

The Bellevue Fire Department says that a fire caused by a pipeline breach would be “catastrophic,” and “would deplete the response and mitigation abilities of the jurisdiction.”<sup>18</sup> Emergency responders would be deployed from SeaTac with special fire-fighting foam to extinguish the fire, but it could take an hour or more before the flames were extinguished. The loss of property and life following such a disaster could be enormous.

The Energize Eastside EIS concedes that the devastation caused by a pipeline fire would be terrible, but the probability of an accident is low. However, we do know that pipeline fires occur. The Olympic Pipeline has suffered two fires in recent years: a 1999 fire in Bellingham, which killed three kids; and a fire in Renton five years later that sent emergency responders to the hospital.

The Energize Eastside corridor is not wide enough to safely operate 230 kV transmission lines and two petroleum pipelines. According to the National Electric Safety Code (NESC), the minimum corridor width for a 230 kV transmission line is 120 to 150 feet in an urban area. Although PSE claims to follow the NESC standard, the corridor is only 100 feet wide in many places. Also, the NESC code applies to a corridor containing *only* the transmission lines, not one that contains two petroleum pipelines running at full capacity.

The National Electric Safety Code (NESC) specifies minimum horizontal and vertical clearance requirements for overhead lines.

These clearance requirements must be complied with. Specific easement agreements may require more clearance.

The following chart lists typical right-of-way widths for various electric line voltages and locations.

VOLTAGE	URBAN	TYPICAL WIDTH (FEET)	RURAL
34 kilovolts (kV)	50-100		100
46 kV	50-100		100
69 kV	50-100		100
115 kV	70-100		100
138 kV	70-100		100
161 kV	100-120		120
230 kV	120-150		150
345 kV	150		150
765 kV	200		200

Figure 10 – National Electric Safety Code requires a wider corridor for 230 kV transmission lines

<sup>17</sup> “The [school] site shall not be located ... within 1500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard”, <https://www.cde.ca.gov/ls/fa/sf/title5regs.asp>, Article 2, 14010.h.

<sup>18</sup> [https://bellevuewa.gov/sites/default/files/media/pdf\\_document/Standards%20of%20Coverage.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/Standards%20of%20Coverage.pdf), pp. 64-66

## Would Energize Eastside reduce emissions?

In 2019, the Washington legislature passed the Clean Energy Transformation Act, requiring Washington’s investor-owned utilities (including PSE) to provide carbon neutral electricity by 2030, and carbon free electricity (meaning *zero emissions* – no offset credits) by 2045. This is one of the most ambitious clean electricity mandates in the nation.<sup>19</sup>

It is hard to overstate the challenge this goal presents to PSE, which currently burns coal and natural gas to generate 66% of the electricity it delivers to customers.<sup>20</sup> The following map shows why decisive action is urgently needed. During the past few years, Washington’s electric grid had the largest percentage increase of carbon emissions among all states:<sup>21</sup>

### Good news: the greening of electric grids

Even under the administration of pro-coal President Donald Trump, many U.S. states migrated toward renewable sources or natural gas for electric power. But in the Pacific Northwest a drought curbed hydropower – a gap filled by coal and natural gas.

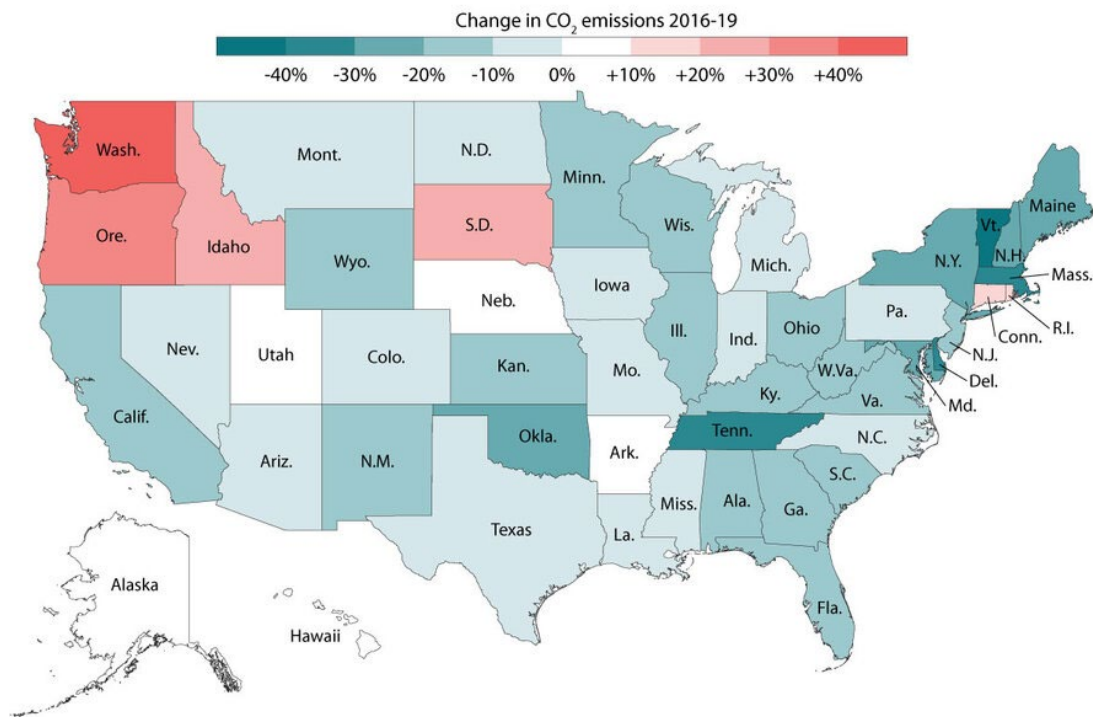


Figure 11 – Emissions of CO<sub>2</sub> increased faster in Washington than other states for 2016-2019

Taken as a whole, Washington’s electricity is comparatively clean due to plentiful hydropower supplied by the Columbia River and other sources. However, our dependence on hydropower makes our state vulnerable to droughts and the growing threat of years with low snowpack. To save our salmon, there

<sup>19</sup> <https://www.jdsupra.com/legalnews/the-race-to-a-clean-electricity-future-5094469/>

<sup>20</sup> <https://www.pse.com/en/pages/energy-supply/electric-supply>

<sup>21</sup> <https://www.csmonitor.com/Environment/2021/0405/Carbon-score-card-Emissions-are-down-but-big-tasks-ahead-for-Biden>

are serious discussions about dismantling several dams on the Snake River that supply hydropower,<sup>22</sup> further increasing the need for other sources of electricity.

In the future, to comply with our state’s clean energy law, PSE will need to acquire more renewable resources to generate electricity. In addition to hydropower from the Columbia River and Canada, feasible options include energy generated by wind in Montana, Wyoming, and floating turbines off the Oregon and Washington coast, and solar energy from eastern Washington and California.

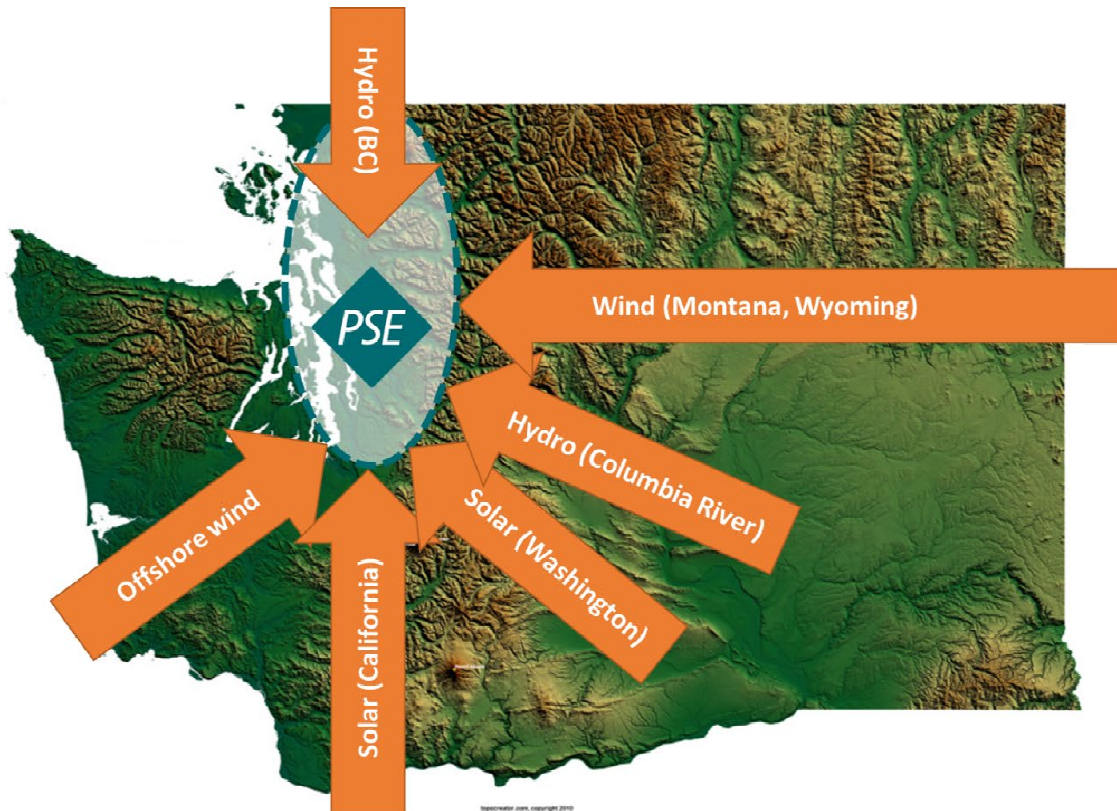


Figure 12 – Renewable electricity will come from distant sources

These diverse sources will deliver electricity to the Puget Sound region using long-distance transmission lines. But those transmission lines serve a fundamentally different purpose than those projected for Energize Eastside. Energize Eastside does not connect PSE’s customers to any new renewable resource. Energize Eastside would only be needed to move incremental amounts of electricity (dirty or clean) during an unlikely scenario where many grid failures occur simultaneously.

To be clear, Energize Eastside does not increase our supply of renewable electricity. It invests hundreds of millions of dollars for a project of dubious value. That money would be better spent on renewable sources to supply cleaner electricity. Worse, the project increases emissions by cutting down thousands of valuable urban trees that clean our air, store carbon, and reduce summer energy consumption by cooling our neighborhoods.

<sup>22</sup> <https://www.spokesman.com/stories/2021/feb/25/scientists-say-removing-snake-river-dams-is-necess/>

## Does Energize Eastside help achieve state, county, and city emissions goals?

Washington’s Clean Energy Transformation Act (CETA) was passed in 2019. In the same year, sixteen cities in King County updated their commitments to reduce emissions by 50% by 2030 through the K4C agreement.<sup>23</sup> These state, county, and city goals are not achievable unless PSE successfully reduces greenhouse gas emissions from the production of electricity. Is PSE on track to do its part?

On May 6, 2021, the Sierra Club and 35 organizations and community leaders submitted a letter to the UTC expressing strong concerns about PSE’s 2021 20-year Integrated Resource Plan.<sup>24</sup> PSE was criticized for its inexplicably slow acquisition of renewables, plans to build a new gas-powered generation plant, and inadequate efforts to reduce demand.

A letter from King County Executive Dow Constantine also addressed the threat that PSE’s plan poses to ratepayers and residents:

*A long-term plan that continues to rely heavily on fossil-fuel based electricity generation and thermal resources is economically risky for ratepayers, impacts our residents’ health, and runs counter to our commitments to reducing greenhouse emissions and increasing production and use of clean renewable energy.*<sup>25</sup>

To reduce the amount of electricity produced by fossil fuels and reduce harmful greenhouse gas emissions, PSE must reduce *peak demand* – the highest levels of consumption that occur during morning and early evening hours on the hottest and coldest days of the year. Why are these peaks a concern? Because peak demand is often served by PSE’s dirtiest generators, known as “peaker plants.” These generators are expensive to build and operate, and they produce the highest levels of pollutants and greenhouse gases of all energy sources after coal is eliminated from our energy supply in 2025 (another CETA mandate). However, peaker plants are used only for a small number of hours each year. If we could reduce peak demand, peaker plants would run less often and PSE would not need to build new ones.

## Is Energize Eastside the best way to serve the Eastside’s energy future?

Energize Eastside is designed to avoid rolling blackouts during moments of peak demand. The previous section describes why peak demand must be reduced to achieve state, county, and city emissions targets. With a little foresight, PSE can kill two birds with one stone (apologies to bird lovers everywhere!)

Here are a few of the policies and technologies that can be used to reduce peak demand. Some are obvious. Others are a little more advanced, so we include links to videos that help explain them.

1. **Reduce overall consumption** by promoting and incentivizing energy efficiency solutions (such as better insulation, window shades, and high efficiency heat pumps for space heating and cooling).

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<sup>23</sup> <https://your.kingcounty.gov/dnrp/library/dnrp-directors-office/climate/joint-commitments-update-with-signatures-final.pdf>

<sup>24</sup> <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=1961&year=2020&docketNumber=200304>

<sup>25</sup> <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=1969&year=2020&docketNumber=200304>



2. **Provide “Demand Response” programs** that provide financial incentives to encourage customers to shift optional consumption to off-peak hours. Customers like these programs because they offer choices to reduce their energy bills. See <https://youtu.be/4iTzExD-xQM>
3. **Invest in batteries** that can be charged during off-peak hours and then release the electricity later to reduce the amount of electricity pulled through a straining grid. See <https://youtu.be/eTbuxJISIUE>
4. **Provide solar panel incentives** to encourage customers to invest in a local source of electricity to help serve peak demand on a hot summer day.
5. **Develop “virtual power plants”** – smart software that coordinates the operation of many small batteries in homes and electric cars to create an invisible power plant capable of producing hundreds of megawatts of electricity within seconds. See <https://youtu.be/-KQEt5QqPXU>
6. **Plant more shade trees** that cool Eastside communities during periods of high summer heat.

Residents and businesses would like PSE to pursue some or all of these ideas to increase reliability and reduce greenhouse gas emissions. PSE is making some progress, but its actions do not match the public’s growing sense of urgency to make rapid progress towards reducing emissions.

For example, in April 2021, PSE asked the UTC for permission to delay an RFP (Request for Proposals) to acquire Demand Response technology from participating vendors. In return, PSE would study a new technology known as “virtual power plants.”

CENSE was initially conflicted about delaying a technology that would mitigate the need for Energize Eastside, but we support the UTC’s decision in favor of the plan, described here:

*[PSE] contends that developing requirements for a virtual power plant (VPP) platform prior to issuing its targeted RFP will allow bidders to better tailor their bids to fit the Company’s system operations. This enabling technology will improve integration and operations...<sup>26</sup>*

After six months, PSE’s “virtual power plant platform” will be better developed. Soon after that, bids for Demand Response solutions will be submitted in response to PSE’s RFP. These technologies promise to significantly reduce peak demand. However, these recent commitments by PSE were not anticipated nor included in PSE’s original Energize Eastside studies more than five years ago. For the sake of ratepayers and the environment, no permits should be considered for Energize Eastside until the benefits of a VPP platform are included in updated studies.

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<sup>26</sup> <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=106&year=2020&docketNumber=200413>, p. 2

## What about electric cars?

Often people understand that Energize Eastside isn't needed *now*, but what happens in a few years when everyone is driving electric vehicles? Won't we need a lot of electricity for transportation?

Yes, the total amount of electricity we consume will probably rise as cars and buildings use electricity to replace gas. But it matters *when* the electricity is used. Today, there is a big swing between peaking demand at dinnertime and a lull that occurs in the middle of the night. In the future, electric cars and big batteries will be charged during those quiet hours. During peak hours, many batteries, even those in cars, will discharge electricity to the grid during peak hours. This will be a new local source of electricity that will flow through local distribution lines rather than through transmission lines and transformers.

Other smart technologies, like Demand Response, will provide financial incentives for customers to voluntarily reduce electric consumption during peak hours. Those who choose to participate will be able to reduce their monthly electric bills.

In the summer, rooftop solar panels will generate electricity during hot summer afternoons. Solar power will help to offset consumption by air conditioners that keep our homes and businesses comfortable.

All these factors will keep peak demand from growing, even if total electricity consumption rises. These factors are reflected in PSE's 2021 Integrated Resource Plan. The company expects peak demand for electricity to decline for the next ten years:<sup>27</sup>

Figure 6-9: Electric Peak Demand Forecast (MW), before Additional DSR and after Applying DSR

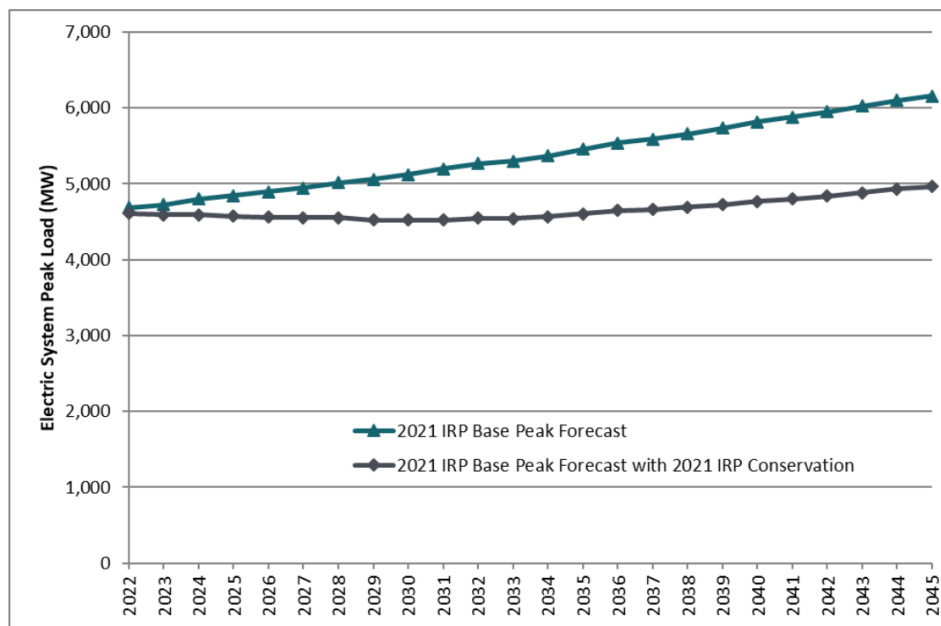


Figure 13 – PSE's peak forecast, accounting for conservation, declines until 2032

27

[https://oohpseirp.blob.core.windows.net/media/Default/Reports/2021/Final/IRP21\\_Chapter%20Book%20Compressed\\_033021.pdf](https://oohpseirp.blob.core.windows.net/media/Default/Reports/2021/Final/IRP21_Chapter%20Book%20Compressed_033021.pdf), p. 6-12

But wait – PSE’s graph shows demand starting to go up after 2033. Will Energize Eastside be needed after that?

Well, it’s hard to forecast what will happen ten years from now. Maybe we will have even better and cheaper batteries, solar panels, and dishwasher-sized nuclear fusion generators powering our homes (one can dream!)

But we should point out PSE also has a hard time predicting the future. The company’s ten-year demand forecasts have been higher than measured demand for many years. One reason for the consistent overshoot is that the company doesn’t know what kind of conservation opportunities might be available a decade from now. Instead of making an educated guess, the company simply stops accounting for important elements of conservation effects after ten years. This explains why PSE’s demand forecasts always turn upward about halfway through the 20-year planning period. The UTC has criticized this practice, but PSE has not corrected the problem.

Until there is good evidence to the contrary, the safest assumption is that peak demand will not increase for the foreseeable future. If demand does begin to tick upwards someday, we will have many good technology solutions to address the issue.

## UTC concerns

The questions and concerns raised in this report do not belong to CENSE alone.

In response to PSE’s 2017 Integrated Resource Plan (IRP), PSE’s state regulator, the UTC, asked PSE four questions about Energize Eastside, summarized as follows:<sup>28</sup>

1. How much of the project’s capacity serves large regional flows of electricity to Canada and California occurring simultaneously with the Eastside emergency scenario?
2. PSE assumes five generation facilities in western Washington are offline during an Eastside emergency. How much does this assumption drive the need for the project?
3. Why did PSE refuse to share modeling data with stakeholders who obtained Critical Energy Infrastructure Information from the Federal Energy Regulatory Commission?
4. Does declining peak demand impact the need for the project?

In 2019, a group of stakeholders participating in an IRP planning meeting asked if PSE would answer the UTC’s questions.<sup>29</sup> The company replied, “No.”<sup>30</sup>

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<sup>28</sup> <https://cense.org/wp-content/uploads/2021/05/utc-final-acknowledgment-160918-99-pse-irp.pdf>, p. 10

<sup>29</sup>

[https://oohpseirp.blob.core.windows.net/media/Default/Action\\_Items/2019\\_1104\\_CENSE\\_Vashon\\_CAG\\_Bridle\\_Trails\\_Energize\\_Eastside.pdf](https://oohpseirp.blob.core.windows.net/media/Default/Action_Items/2019_1104_CENSE_Vashon_CAG_Bridle_Trails_Energize_Eastside.pdf), see question 2 on page 6

<sup>30</sup>

[https://oohpseirp.blob.core.windows.net/media/Default/Comment\\_Reports/2019\\_November\\_IRP\\_CommentSummary\\_WEB.pdf](https://oohpseirp.blob.core.windows.net/media/Default/Comment_Reports/2019_November_IRP_CommentSummary_WEB.pdf), p. 10

Council members who are tasked with evaluating PSE's permit application should be aware that PSE continues to dodge basic questions about the need and prudence of this expensive project. These questions were raised by CENSE, by other IRP stakeholders who live far from the Eastside, by UTC staff members, and by the Commissioners themselves. None of these parties, however, has the authority to compel PSE to answer. But land use examiners and council members do have the authority to decide if PSE has fulfilled the conditions of their jurisdiction's land use codes. In Bellevue, land use codes require proof of need and thorough evaluation of alternatives.

## Conclusion

As you fully and fairly evaluate PSE's application to build Energize Eastside, please consider these facts:

1. The applicant is a private corporation that is obligated to maximize profits for its owners.
2. High rates of return guaranteed by the state (and paid by customers) provide incentives for private utilities to build big infrastructure projects like Energize Eastside. PSE will collect a 9.8% annual rate of return, earning more than ONE BILLION dollars over the lifetime of this project.
3. By skipping EFSEC review and approval, PSE has chosen a slow and expensive process that can be influenced by political pressure and marketing campaigns. PSE hired specialists who could "elect this project to public office" rather than risking scrutiny of its technical merits.
4. Energize Eastside is based on a very unlikely set of simultaneous emergencies and an outdated forecast that does not reflect the reality of declining peak demand on the Eastside.
5. PSE's ubiquitous advertising has led the public to expect Energize Eastside would deliver significant reliability improvements. However, the project will not reduce the kind of outages PSE's customers have endured during the last decade.
6. Energize Eastside would increase risk of a catastrophic pipeline fire that cannot be extinguished by the Bellevue Fire Department. According to national safety standards, the corridor is too narrow to safely operate two 230 kV circuits and two liquid fuel pipelines.
7. Energize Eastside would not help state, county, and city initiatives that seek to reduce greenhouse gas emissions. The project would destroy thousands of valuable urban trees.
8. Smart technologies like Demand Response, batteries, and Virtual Power Plants would deliver greater reliability with less harm to communities and the environment.
9. Even electrification of transportation and buildings is unlikely to increase peak demand significantly, according to PSE's latest Integrated Resource Plan.
10. PSE's state regulator posed basic questions about the project that PSE refuses to answer.

**There are better ways to serve the Eastside's energy future. Please reject PSE's application for permits to build this expensive, outdated, and harmful project.**

## Pittman, Reilly

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**From:** EBCC  
**Sent:** Thursday, May 27, 2021 10:44 PM  
**To:** Hummer, Betsi; Kasner, Steve; Gooding, Ross; Dhananjaya, Hassan; Epstein, Ron  
**Cc:** Betsi Hummer; kasner4council; Ross Gooding; Hassan Dhananjaya; RON EPSTEIN; Bedwell, Heidi  
**Subject:** FW: Written comments for June 1, 2021 meeting of East Bellevue Community Council

Chair Hummer and EBCC council members,

I am forwarding written communication from Jennifer Keller regarding PSE's Energize Eastside project. As this is a quasi-judicial matter that will come before the EBCC, this email has also been forwarded to Heidi Bedwell for inclusion in the project file as a public comment. It is important that you do not respond to Ms. Keller or have any communication with either PSE or project opponents while this matter is pending in order to avoid violating the appearance of fairness doctrine. Please contact Chad Barnes if you have any questions.

Karin

**Karin Roberts, CMC** | Deputy City Clerk  
City of Bellevue | [www.bellevuewa.gov](http://www.bellevuewa.gov) | P: 425.452.6806

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**From:** Jan Keller <jankeller3@gmail.com>  
**Sent:** Thursday, May 27, 2021 2:42 PM  
**To:** EBCC <EBCC@bellevuewa.gov>  
**Subject:** Written comments for June 1, 2021 meeting of East Bellevue Community Council

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello East Bellevue Community Council,

Thank you for taking the time to learn more about Puget Sound Energy's "Energize Eastside" project, and thank you for the opportunity to submit comments.

I'm a resident of Lake Hills. My address is 115 – 146th Ave SE, Bellevue, WA, 98007. I've lived in Bellevue for the last eighteen years, and also spent much of the 1990's living in Bellevue.

I'm writing today for multiple reasons. One is simply because I care about the beauty of places like the forest in Kelsey Creek Park, where I frequently walk. Another is to encourage Bellevue (including East Bellevue) and other nearby cities to turn toward the future, and embrace clean energy, energy efficiency, and storage technologies. And a third is to highlight concerns about PSE's claims and presentations that come not just from residents but from agencies like the Washington Utilities and Transportation Commission (UTC).

I'm very concerned about the claims that PSE tries to make about Energize Eastside, and their weak, patchy, and/or outdated documentation for those claims. Along with that, there are many key questions about need, reliability, safety, and impact that PSE tries to avoid answering about Energize Eastside. Why do they offer weak documentation? Why do they dodge questions? Because there's no good reason to build Energize Eastside. And there are many reasons to abandon the project and begin putting those investments into things we need for the future, such as smart-grid technology, demand-side management, clean energy, and batteries.

I could bring up a variety of concerns about PSE's claims, but I want to focus on the ways they have exaggerated the supposed need for Energize Eastside. They started by inflating their projections of future demand for electricity. The UTC

has called out the fact that in multiple Integrated Resource Plans (IRPs) submitted over the years by PSE, the inflated demands that PSE projects just don't materialize. Of course, making such projections is complex, but nearby utilities such as Seattle City Light have adjusted their algorithms over time, avoiding such inflated projections. But PSE has not managed to make such adjustments. They prefer to do a poor job at projecting, and hope that people will believe their claims about demand—and their claims that Energize Eastside is needed.

Another way that PSE exaggerates the supposed need for Energize Eastside is by coming up with a scenario through which our electrical grid would be stressed past its capacity (implying that we need more capacity). Of course, it's important for a utility to look at stress conditions and potential failure scenarios, and to assume that from time to time, multiple stress conditions will happen at the same time. In fact, the standards that come from the Federal government (NERC) outline how a utility should have emergency response plans to avoid power outages even if two major components fail during the year's biggest demands for electricity. But PSE goes far beyond such a scenario, creating a long list of stress conditions that have never happened simultaneously in the Puget Sound area. Based on this list, PSE tries to claim that Energize Eastside is somehow needed. But the list has no basis in requirements or in reality.

These problems with PSE's claims are extremely serious. It would be one thing to be sloppy about the need for a minor, non-disruptive project. But consider how expensive, dangerous, and destructive Energize Eastside would be. It would cost hundreds of millions of dollars—paid for, with a 9.8% annual profit piled on top, by ratepayers. It would present significant danger because the utility corridor is too narrow for the higher voltage, and the corridor is also shared with a liquid-fuel line. It would be very destructive, requiring the loss of thousands of mature urban trees that will take many decades to replace. We need those trees to clean and cool the air, and to keep storing carbon at this critical time.

PSE has taken many other questionable steps in the process of trying to push Energize Eastside through, despite residents' many concerns. PSE has made a variety of other unfounded claims (for example, about Energize Eastside helping reliability), has refused reasonable requests for documentation of their claims, and has switched claims around (winter demand vs. summer demand) without explanation, and without making the corresponding corrections to other parts of its documentation. PSE also appears to be sidestepping the normal approach that a utility would take when proposing a regional energy project crossing several municipalities. The normal approach would be to submit the proposal to the state Energy Facility Site Evaluation Council (EFSEC). It would appear that PSE prefers to pressure local governmental entities rather than go to the entity (EFSEC) that is specifically designed to evaluate such a proposal based on factual, well-constructed background information.

Again, I very much appreciate that you are taking the time to learn more about Energize Eastside. I hope you will look carefully at the kinds of issues that I and other residents have raised. PSE has chosen to ask local government entities to review, piecemeal, its proposals for this large, ill-founded, destructive project. Therefore, it falls to residents like me, and Council members like you, to look carefully at what PSE is proposing and how they have gone about making their proposals. It also falls to us to ask questions of PSE and, if PSE does not provide full, clear answers, to consider what PSE is exaggerating or leaving out, and why.

Thank you.

Jennifer Keller  
115 – 146<sup>th</sup> Ave SE  
Bellevue, WA 98007

## Pittman, Reilly

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**From:** Bedwell, Heidi  
**Sent:** Thursday, May 27, 2021 4:43 PM  
**To:** 'Lara Prior'  
**Subject:** RE: Energize Eastside Bellevue public comment

Thank you for providing comments on PSE's application to construct a transmission line 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.

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://bellevuewa.gov/city-government/departments/development/zoning-and-land-use/public-notices-and-participation-2>



**Heidi M. Bedwell** (She/Her)  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[How are we doing?](#) 👍 👎

*With the appearance of new cases of the COVID-19 virus in King County the Development Services Permit Center has been temporarily closed to walk-in customers and we are requiring residents and customers to use online city resources at <http://development.bellevuewa.gov>.*

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**From:** Lara Prior <lara.prior@outlook.com>  
**Sent:** Thursday, May 27, 2021 4:40 PM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>; LandUseReview <LUZI@bellevuewa.gov>  
**Subject:** Energize Eastside Bellevue public comment

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13606 SE 3<sup>rd</sup> PL  
Bellevue, WA 98005  
May 27, 2021

Dear City of Bellevue Planners,

I am writing you to reject the requested permits by PSE in Bellevue for the Energize Eastside project.

I believe this project will be unsafe due to the proximity to fuel pipelines, have a detrimental impact on the environment, trees and wildlife. I believe this project will increase exposure to harmful radiation and put citizen's health at risk.

The current voltage is considered medium this project would increase to a very high transmission, one that is considered harmful to human health.

Based on years of careful research by volunteers of CENSE and industry experts, I believe Energize Eastside:

**WILL**

- destroy over 2,000 significant trees in Lake Hills and install poles 20-30 feet taller than existing poles.
- construct dangerous high voltage lines near aging Olympic fuel pipelines.
- raise our electricity bills for many decades.

**WON'T**

- preserve and protect the beauty or quality of life in Lake Hills.
- improve reliability of electricity for Lake Hills residents.
- increase availability of safe, clean energy for any PSE customer.

I urge the city of Bellevue to protect the homeowners in this community we call home, and the animals and the trees.

Sincerely,

Lara Prior

Homeowner in Bellevue for 10 years in Glendale.



## Pittman, Reilly

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**From:** Chung, Lawrence <lachung@kingcounty.gov>  
**Sent:** Thursday, May 27, 2021 4:13 PM  
**To:** Bedwell, Heidi  
**Cc:** Greene, John  
**Subject:** KC Metro Comment re: Energize Eastside Bellevue North Segment (File Number: 21-104991 LB and 21-104989 LO)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Heidi,

King County Metro has received notification regarding Energize Eastside Bellevue North Segment (File Number: 21-104991 LB and 21-104989 LO) and has the following comments. Please let me know if you have any questions. Thank you.

Comment #1:

“Metro’s System Impact Construction Coordinators would need advance notice on when the construction project will start so Metro can request for a copy of the TCP to review.”

Comment #2:

“If the project will impact any King County Metro bus stops or facilities, please email to [busstopprojects@kingcounty.gov](mailto:busstopprojects@kingcounty.gov) to coordinate.”

Comment #3:

“For any project updates or changes, please contact Metro via email at [Construction.Coord@kingcounty.gov](mailto:Construction.Coord@kingcounty.gov), [plansreview@kingcounty.gov](mailto:plansreview@kingcounty.gov), and Liz Gotterer at [Liz.Gotterer@kingcounty.gov](mailto:Liz.Gotterer@kingcounty.gov). Refer to <https://www.kingcounty.gov/transportation/kcdot/MetroTransit/Construction.aspx> for more information.”

Best Regards,

Lawrence Chung  
Transit Environmental Planner II  
King County Metro Transit  
201 South Jackson St., MS KSC-TR-0431  
Seattle, WA 98104-3856  
(206) 263-5504  
[lachung@kingcounty.gov](mailto:lachung@kingcounty.gov)

## Pittman, Reilly

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**From:** Carol Cohoe <Carol@aramburu-eustis.com>  
**Sent:** Thursday, May 27, 2021 4:10 PM  
**To:** EBCC; Bedwell, Heidi  
**Cc:** aramburulaw@gmail.com  
**Subject:** PSE EE Proposal, North Segment  
**Attachments:** CENSE 20210527 Att.A LUC 20.20.255.pdf; CENSE 20210527 Comment to EBCC re PSE NS EE.pdf

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Please accept for the record and provide the attached Comment Letter regarding the PSE EE North Segment application to the East Bellevue Community Council Members and appropriate Bellevue staff for the upcoming June 1, 2021 public meeting.

Carol Cohoe, Legal Assistant  
Law Offices of J. Richard Aramburu, PLLC  
*Please "REPLY ALL" to ensure that Mr. Aramburu also receives your response.*

We are located in the Hoge Building at  
705 Second Avenue, Suite 1300  
Seattle, WA 98104-1797  
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.

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May 27, 2021

Heidi Bedwell  
Associate Planner, DPCD  
City of Bellevue  
450 110th Avenue NE  
PO Box 90012  
Bellevue, WA 98009-9012  
By Email to: [hbedwell@bellevuewa.gov](mailto:hbedwell@bellevuewa.gov)

East Bellevue Community Council  
c/o Karin Roberts, Deputy City Clerk  
450 - 110th Ave NE  
Bellevue, WA 98004  
By Email to: [EBCC@bellevuewa.gov](mailto:EBCC@bellevuewa.gov)

Re: Puget Sound Energy's "Energize Eastside" proposal, North Segment  
Bellevue Application File No. 20-112645

Dear Ms. Bedwell:

As you are aware, this office represents the Coalition of Eastside Neighbors for Sensible Energy (CENSE), a Washington nonprofit corporation. For the past seven years, CENSE has been intensively involved in the permitting process for the "Energize Eastside" project, an eighteen-mile electric transmission proposal through Bellevue and other Eastside communities proposed by Puget Sound Energy (PSE).

I write today to provide comments on the PSE application for the "North Segment" of its transmission project, an approximately 5.2 mile portion of the overall Energize Eastside project. The "North Segment" begins at the north side of the Lakeside substation and ends at the northern city limit.

In summary, the underlying facts and circumstances demonstrate that the North Segment does not meet the criteria for approval of new transmission under Bellevue codes; accordingly, the application should be denied. In particular, PSE has not demonstrated that the proposal meets the need and reliability standards of the code,

and new technologies addressing the proffered concerns of the applicant have not been fully considered. CENSE's comments are detailed below.

## **A. PROJECT BACKGROUND AND REGULATORY HISTORY.**

In the early 2000s, PSE indicated its interest in building new transmission facilities at increased voltages on the Eastside. The project was defined in the January 2016, Phase 1 ("P1") Draft EIS (page 1-1, or page 53 in the PDF) as follows:

*PSE is proposing to construct and operate a new 230 kilovolt (kV) to 115 kV electrical transformer served by approximately 18 miles of new high-capacity electric transmission lines (230 kV) extending from Renton to Redmond. The proposed transformer would be placed at a substation site near the center of the Eastside.*

PSE branded its proposal as "Energize Eastside" (EE). The proposal will replace wooden poles with smaller and lower transmission lines with new, higher and wider metal poles and wires which double the voltage now carried.

Regulatory steps concerning the project began in Bellevue about thirteen years ago; a brief chronology of events is as follows.

- **March 3, 2008.** The Bellevue City Council adopted two ordinances relating to PSE's electrical system.

Ordinance 5802 amended the Utility Element of the Bellevue Comprehensive Plan relating to transmission lines, providing new regulations and changing maps describing the electric transmission system. It provided that *"it is important to insure that new and expanding electrical facilities are sensitive to neighborhood character."* The Ordinance also included a new map (Figure UT.5a) that identified the "Lakeside -Talbot 230 KV" as a "Planned transmission line upgrade to 230KV." Figure UT.5a designated "Sensitive Sites" requiring special review, although the area adjacent to the "Lakeside - Talbot 230 KV" line was not designated as a sensitive site.

Ordinance 5805 amended the Bellevue Land Use Code ("LUC") consistent with Ordinance 5802. Ordinance 5805 enacted a new and unique set of standards for new or expanded "Electric Utility Facilities" (which includes transmission lines), later codified in the LUC at 20.20.255 (hereinafter "Section 255"). The full text of Section 255 is found in Attachment A to this brief. As will be discussed in more detail below, Section 255 distinguished between projects on "Sensitive Sites" and those not on sensitive sites. Projects on non-sensitive sites required only an administrative conditional use permit, while those on Sensitive Sites required compliance with the "Alternative Siting Analysis" (the "ASA") in Subsection D of Section 255 as well as full Conditional Use

Permit analysis. The ASA required a) consideration of a minimum of three alternative site options (with at least one in the district “primarily served” by the project), b) explicit showing of need as follows:

*i. Describe whether the electrical utility facility location is a consequence of needs or demands from customers located within the district or area; and*

*ii. Describe whether the operational needs of the applicant require location of the electrical utility facility in the district or area[;]*

c) a detailed “location selection criteria” preferring non-residential areas, and d) a detailed analysis of the “range of technologies” considered in the alternatives review. Section 255 specifically referred to Figure UT-5a of the comprehensive plan, showing locations of PSE’s facilities.

- **December, 2013.** PSE announces it will apply for permits to build an 8.5 mile 230 kV electric transmission line in Bellevue, as part of an 18 mile line connecting the Talbot Hill (in Renton) and Sammamish (in Redmond) substations. Though work begins on an environmental impact statement (EIS) and some community meetings are held, no applications for construction are filed.
- **August 2015.** The Bellevue City Council adopts Ordinance 6251, which updates the Bellevue Comprehensive Plan. The updated plan amends the previous Utilities Element by deleting Figure UT-5a. In its place, a new map of electric facilities, Map UT-7, was adopted, which “*shows the general locations and conceptual alignments of Puget Sound Energy’s planned facilities together with the City’s sensitive siting classifications.*” Significantly, the area of the proposed PSE 230 kV transmission line route (including the North Segment in Bellevue) was changed from non-sensitive to “*Sensitive Siting*,” requiring Alternative Siting Analysis. The change in designation is described at page 131 of the comprehensive plan:

*Map UT.7 identifies planned electrical facilities that have the potential to create significant incompatibilities with Bellevue neighborhoods. It reflects an analysis of planned facility locations and manner of expansion anticipated by Puget Sound Energy’s system plan. Such sensitivity factors as proximity to residential neighborhoods, visual access, and expansion within or beyond an existing facility border were considered in identifying potential incompatibilities. The early screening represented in Figure UT.7 identifies a list of facilities that will require special regulatory siting scrutiny. This is intended to increase transparency of the siting process for*

*Puget Sound Energy and the public, while also ensuring the utility's ability to meet system needs.*

(Emphasis supplied.)

- **January, 2016.** PSE and the City release the “Phase 1, Draft Environmental Impact Statement” (“P1 Draft EIS”), which discusses the general need for the project.
- **September, 2017.** PSE files an application for just the southern portion (3.3 miles) of its transmission project, thereby dividing the proposal into two parts, roughly at I-90, including permitting and construction of a new substation as part of the south Bellevue portion of the project. It promises an application for the North Segment later in 2017, but none is filed. CENSE objects to the bifurcation of the proposal but Bellevue staff continues to process just the application for the South Segment. Eventually, the City Council approves the South Segment proposal, but makes it clear it is approving only the South Segment and will consider the north segment, if and when applied for, independently.
- **March, 2018.** A Final EIS for the Energize Eastside project is issued.
- **March, 2021.** PSE files an application for the North Segment (5.2 miles), just over 13 years after the project was included in the Comprehensive Plan. At the time of application, there remain other gaps in the 18 mile EE proposal. Applications for approval of the new transmission lines in Newcastle (1.5 miles) were filed in the fall of 2017, though no hearings on that segment have been held and no permits issued. The final segment includes 2 miles of transmission in Redmond, but no applications for transmission line approval have been filed there.

Though it does not have permits to complete the full 18 mile project, either to the north or south, PSE began construction on its Richards Creek substation in mid-2020. As described above, Richards Creek is currently an isolated, “orphan” substation as it has no connections to the north and south.

In December, 2019, the Bellevue City Council approved the South Segment.

**B. THE PROPOSAL FAILS TO MEET THE APPROVAL STANDARDS UNDER SECTION 255.**

As described above, the EE project was recognized in the Bellevue Comprehensive Plan in March, 2008, with the adoption of ordinances by the Council

providing a whole new regulatory structure for approval of PSE transmission lines in Bellevue.

The adoption of Section 255 constituted a sea-change in how new electric facilities were considered in the City of Bellevue. Instead of limiting review to the land use and environmental impacts of transmission and substations, Section 255 expanded the review to include the purpose for the new facility, focusing on need, reliability, alternative sites and emerging technologies. Clearly the City Council recognized that the City and its residents needed additional protection in future land use decisions regarding utility lines. Because PSE is the only entity that provides electric service to customers in Bellevue, Section 255 regulated only PSE.

Key to this implementation of Section 255 was the “*alternative siting analysis*” (ASA) in Subsection D, which required not only that alternative sites be considered, but also for the applicant to “[D]escribe the range of technologies considered for the proposed electrical utility facility; . . .” Consideration of both centered on whether the facility was in the best location and whether the best technology was employed. “*Reliability*” was also a key issue in the ASA, requiring proof that the transmission proposed “*provides reliability to customers served*” as well as proof that “components” relate to system reliability.

The actual “Decision Criteria” at Subsection E also require that PSE comply with five criteria, including:

3. *The applicant shall demonstrate that an operational need exists that requires the location or expansion at the proposed site;*
4. *The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole, as certified by the applicant’s licensed engineer;*

(Emphasis supplied). Subsection E.5 requires compliance with the ASA and states a preference for location of electric facilities in nonresidential land use districts when the facility serves a nonresidential land use district.

From the very beginning, PSE justified its 18 miles of transmission and new substation at Richards Creek on peak load deficiencies in its transmission system. “Peak loads” are times that customers use the most electricity, in the northwest occurring during very cold winter days (23 degrees) or very hot summer days. PSE contends these peak loads must be met even if there are other events affecting the transmission system, primarily system breakdowns and shortages that might prevent the electric system from meeting these peaks. Thus, PSE justifies the proposal in the P1 Draft EIS at page 1-1 and 1-2 as follows:

*This set of facilities is proposed in order to address a deficiency in electrical transmission capacity during peak periods that has been identified by PSE through its system planning process. This deficiency is expected to arise as result of anticipated population and employment growth on the Eastside, and is expected to negatively affect service reliability for Eastside customers within the next several years. The project would improve reliability for Eastside communities and would supply the needed electrical capacity for anticipated growth and development on the Eastside.*

The P1 Draft EIS was issued in January, 2016, about five and one-half years ago.

PSE pegged the expected population growth at approximately 1.2 percent annually and employment growth at 2.1 percent annually for the next decade after 2015. P1 Draft EIS at 1-5. Converting population and employment into electric growth rates was based on certain preestablished presumptions:

*This forecast is based on the assumption that economic activity has a significant effect on energy demand. Given the nature of expected development, PSE has projected that electrical demand will grow at an annual rate of 2.4 percent.*

P1 Draft EIS at page 1-6 (emphasis supplied). It was not explained why electrical growth would be double the population growth.

The P1 Draft EIS (page 1-6) then warned that peak load deficiencies “*could develop as early as winter of 2017-2018 or summer of 2018, putting customers at risk of load shedding (forced power outages) (Stantec, 2015).*” PSE claimed the situation was even more grave at the end of the 10-year planning period in 2024:

*By the end of the 10-year forecast period, a large number of customers would be at risk, and the load shedding requirement could be as high as 133 MW (Stantec, 2015). Specifically, PSE’s estimate is that in the summer 2024 scenario, over 211,000 customers experience rotating outages on up to 9 days over a period of 16 days. In the winter 2023-2024 scenario, around 175,000 customers experience rotating outages on up to 13 days over a period of 29 days.*



*Id.*<sup>1</sup> Significantly, there were no documented blackouts or shortfalls that required cutting off electricity to customers in the summer or winter of 2018, or 2019, or since.

PSE's solution did not envision that part of the line might be built and solve the shortfalls. Indeed, when that concept was raised, PSE was adamant that only the entire line from Sammamish to Renton would solve the problem; in short, "all or nothing at all." It warned of dire consequences if its plan for the full 18 miles of transmission and a new intermediate substation were not promptly approved and built. Indeed, one of the "broad objectives" stated by PSE in its January 2016 Draft EIS (page 1-16) was:

- *Find a solution that can be feasibly implemented before system reliability is impaired.*

On page 2-10 of the P1 Draft EIS, PSE elaborated on the timing of the project:

*PSE studies show that Eastside customer demand will reach a point when the Eastside's electric transmission system capacity could experience a deficiency as early as winter 2017-2018. To be a viable solution, a project must be completed and in service by the identified target need date. For example, PSE's current schedule for the proposed 230 kV transformer and transmission line installation targets construction to begin in 2017, with project completion in 2018. Any delay in the schedule would push the in-service date beyond the 2018 winter time frame, which would increase PSE's reliance on the use of CAPs and load shedding. PSE must prepare for project construction several years in advance because some specialized equipment can take up to 3 years to procure.*

While PSE forecast dire consequences of delaying the project, it is PSE itself that has delayed implementation of its proposal:

- First it divided the proposal into five separate parts, one each in Redmond, Newcastle and Renton, and two in Bellevue. PSE could have permitted the entire Energize Eastside transmission project in a one-stop permit application and review before the Energy Facilities Site Evaluation Council (EFSEC) as a project in several jurisdictions with different land use standards, as it admitted at page J1-11 of the Final EIS:  
*EFSEC review and certification would pre-empt all local SEPA and permit review. In this case, PSE has not requested EFSEC certification.*

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<sup>1</sup>Though the DEIS did not say, these predictions were for the entire PSE system, not just the Eastside.

PSE's refusal to seek "one stop" EFSEC review made it subject to local regulations.

- Second, it waited until September, 2017, to file applications for the southerly sections of the overall transmission line, which included the Richards Creek substation. Of course, this meant that construction could not begin in 2017, the target date identified in the January, 2015 Draft EIS. PSE knew that permitting delay could mean that the original justification for the proposal might be eliminated by new technological advances or declines in peak electric loads.
- Third, though it is the longest segment at 5.24 miles, PSE did not apply for the North Segment in Bellevue (this application) until March, 2021, four years after the date it targeted for commencement of construction and three years after it said load shedding might be necessary in the summer.
- Fourth, though PSE has stressed that only the whole project would be sufficient to meet its plans, it has not even applied for land use approval for the two-mile Redmond segment, which links the whole project to the Sammamish substation. No explanation was provided as to why Energize Eastside fell off the PSE priority list.

Actions speak louder than words; PSE has recognized that there is no urgency to its proposal. In fact, the record makes clear that even if there was justification for the project in 2013 or 2015, that justification has evaporated in light of new and changed conditions, circumstances and technology. Indeed, PSE admitted in its FEIS that time may catch up with its transmission plans at page J1-11:

*It is acknowledged that, over the long term, energy efficiency, economic conditions and other factors may reduce the actual loads, thus delaying the need for the project.*

The time has come for cancellation of the Energize Eastside project, as PSE admitted it might. In fact, two long term factors questioning the justification for the project were identified in the Washington Utilities and Transportation Commission (WUTC) Acknowledgment Letter on PSE's 2017 Integrated Resource Plan (IRP) (June, 2018).

First, WUTC said PSE's growth rates were "*overly optimistic*," i.e. exaggerated. In both its Draft (2016) and Final EIS (2018), PSE predicted that peak loads would increase by 2.4 percent annually.<sup>2</sup>

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<sup>2</sup>In fact, the environmental impact statement process was under the control of the City of Bellevue and it is responsible for any error in the document. It is presumed that the City simply passed on PSE's load forecasts.

The fundamental problem with PSE’s stated justification for the EE project was its estimated rate of growth of electric loads. In the January, 2016 Draft EIS it stated that peak loads would increase by 2.4 percent annually. But in the runup to the P1 Draft EIS, from 2008 to 2014, WUTC pointed out that PSE had projected Average Annual Growth Rates (AAGRs) of 1.75 to 1.90 percent. However, actual growth was negative: -0.19 to -1.19 %, a net difference of more than 2% as shown in Figure 2:

**Figure 2: PSE’s projected and actual average annual growth rate of electric energy**

<b>Period</b>	<b>PSE Projected AAGR</b>	<b>PSE Actual AAGR</b>
<b>2006-2014</b>	1.75%	-0.19%
<b>2012-2014</b>	1.90%	-1.19%

Indeed, PSE admitted load growth was not increasing: “The 2017 IRP projects flat to negative annual growth rates for the first 10 years of the Plan when there is projected aggressive energy conservation.” Why PSE continued using high growth rates (2.4%) in the Energize Eastside EIS when it had admitted in submissions to WUTC that it “projects flat to negative annual growth rates for the first 10 years of the Plan” is not explained.

Second, PSE modeled 20 years of retrofit conservation means into the first ten years of the plan. However, for the years beyond the first 10 years of the forecast, PSE says there will be “zero contribution from retrofit conservation measures.” WUTC, page 11. WUTC says that was an incorrect assumption, also on page 11:

*However, the only conservation remaining in PSE’s IRP model in years 11 through 20 are measures that are replaced on “burn-out” or new construction, with zero contributions from retrofit conservation measures. This lack of any retrofit conservation in the later years significantly affects the energy demand and therefore the projected need for new resources beyond year 10. PSE makes the same assumption for its natural gas demand forecasts and retrofit conservation. We agree with Staff’s comments that PSE should assume in years 11 through 20 that a reasonable level of emerging retrofit conservation measures will become available in the market at cost-effective rates even though they cannot be accurately identified or predicted now. This has been the experience in the region for more than three decades.*

Undeterred by WUTC statements that its forecasts were exaggerated when actual growth was negative, PSE continued to use the same growth projection two and a half years after the P1 Draft (January, 2016) in publishing the Final EIS (March, 2018). Indeed, it was nearly word-for-word:

*The Eastside population is expected to grow at a rate of approximately 1.2 percent annually over the next decade, and employment is expected to grow at an annual rate of approximately 2.1 percent, a projection based on internal forecasting conducted by PSE. Given the nature of expected development, PSE has projected that peak electrical demand within the Eastside will grow at an annual rate of 2.4 percent. This forecast is based on the concept that economic activity has a significant impact on energy demand.*

FEIS at page 1-5.

As described above in WUTC comments, PSE's forecasts are flawed from the outset by a) "overly optimistic" growth forecasts and b) the failure to recognize that "emerging retrofit conservation measures" will be available in the future that "significantly affects the energy demand."

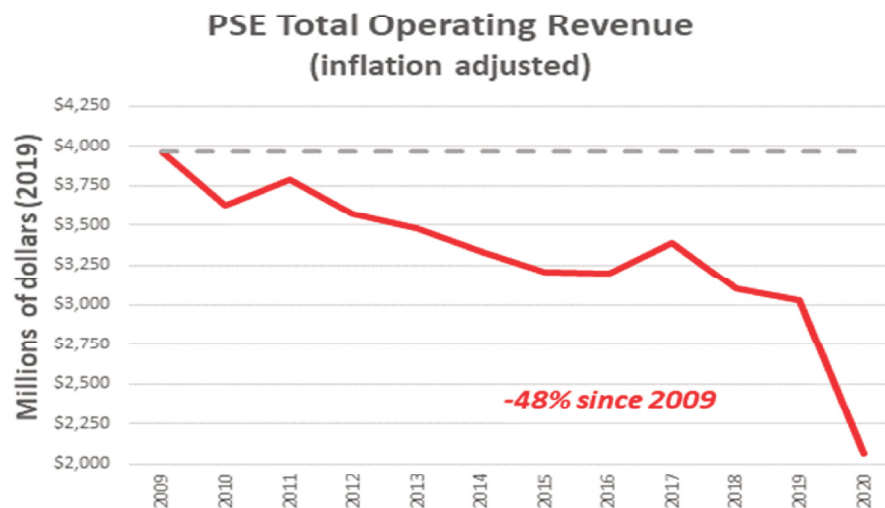
Recent information indicates another significant flaw in PSE's forecasting regime. As explained above, PSE's forecasting is not related to historic growth rates, but on its dogged reliance on the "concept" and "assumption" that population and economic growth will result in corresponding growth in peak electric loads. The old saying that an individual is "often wrong, but never in doubt" certainly fits PSE's approach to predicted load growth. However, responsible forecasting now shows that economic growth does not necessarily result in increased energy demand.

Seattle City Light (SCL) provides electric service to the city of Seattle and adjacent territories, which has experienced growth similar to Bellevue in its high tech and internet sectors, as well as population. In 2017, SCL issued its electric demand forecast for the next ten years (see 2017 RETAIL SALES FORECAST, City Light Review Panel, January 8, 2017). It showed that demand for electricity was actually declining by an Average Annual Growth Rate ("AAGR") of -0.7 percent from 2017 to 2022 and an AAGR of -0.4% from 2017 to 2038, remarkably similar to that in the PSE service area as identified by WUTC (see SCL Retail Sales Forecast, page 16). At the time of the SCL forecast, the City of Seattle was experiencing remarkable economic growth but declining electric consumption. As the SCL Forecast stated in its "Takeaways" conclusion (page 17):

- *Recent History*  
*The past few years have experienced strong economic growth*  
*However, weather adjusted retail sales have remained flat.*  
*Energy efficiency is offsetting economic growth.*

(Emphasis supplied.)

The decline in electric consumption even with strong economic activity is not an isolated PSE or SCL phenomenon. Electric consumption is declining all over the U.S. as a result of energy conservation and energy efficiency. Admittedly good for consumers, it is a serious concern for utilities. Less consumption means less revenue. As demonstrated in the chart below, PSE has had its operating revenues decline by 48% since 2009, when there was general economic recovery after the 2007-08 depression.



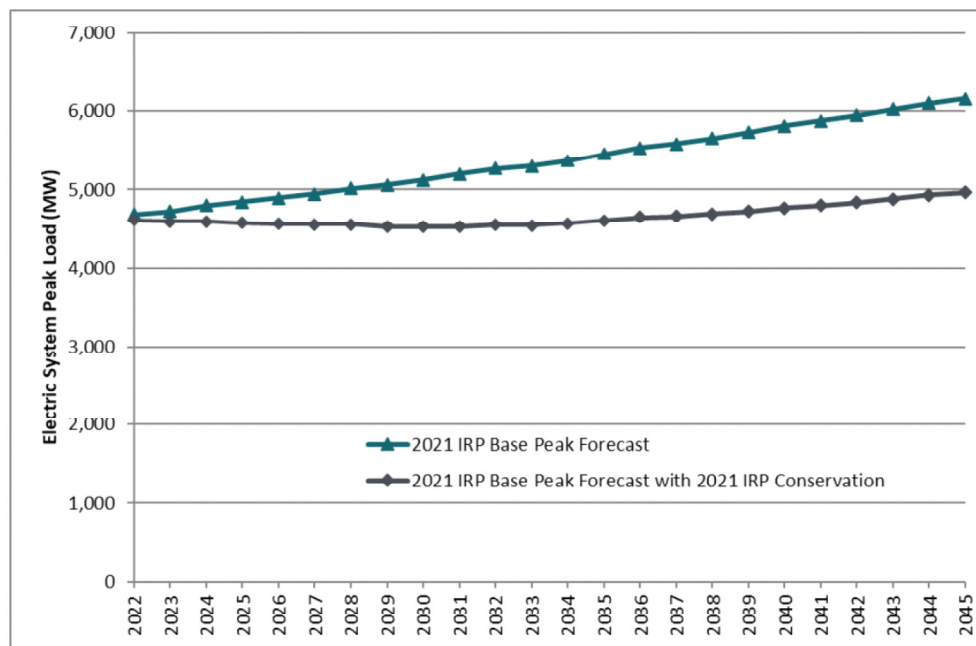
Why then does PSE ignore obvious trends, and even its own statements in its IRP, that electric demand is declining for the foreseeable future? Why does it continue to pursue its transmission project based on a repudiated 2.4% annual growth rate? Conversely, even when it claims severe impacts on ratepayers if its project is not built immediately, why does PSE defer and delay the Energize Eastside project, even to the point that there are not even applications filed for critical segments of the project even now? The answer lies in the unique business model of PSE.

PSE is not a public utility like SCL, responsible to elected officials. Nor is it an entirely private business that must operate without a “safety net” of guarantees of return on investment. Rather, PSE is a regulated utility, in this case by the WUTC. As explained on page 2-11 of the P1 Draft EIS, PSE is allowed to charge back to the customers in its rate base all costs of this project, a provision especially desirable in times of plummeting operating revenues. See above. Under Federal law, PSE is required to report to the Federal Energy Regulatory Commission its expenditures on this project; that figure had already reached \$88,876,253 during the latest report period (2019). This figure is solely what PSE has spent related to advertising and permitting; not an inch of transmission line has been built. Some significant portion of this expenditure is due to PSE’s decision to engage in five separate permit application procedures (two in Bellevue) when EFSEC would have allowed a single, “one-stop” permit. Naturally, PSE will be seeking approval from the WUTC to recover this amount

from the rate payers. Predictably, such recovery would be more difficult if PSE were to take the prudent course of action and discontinue its permit applications for its out-of-date transmission project.

In more recent times, the data have become clear that peak power trends continue to either stay flat or decline. As noted above, PSE's 2017 IRP indicated flat to declining trends for peak power. The same trend continues for the 2021 Peak forecast set forth below:

Figure 6-9: Electric Peak Demand Forecast (MW), before Additional DSR and after Applying DSR



As seen, peak forecasts fifteen years out (2035) are lower than current peaks.

The decline in peak period demand is confirmed by a recent study prepared for the City of Newcastle's review of PSE's project, "Assessment of Proposed Energy Eastside Project" authored by Max ETA Energy and Synapse Energy Economics ("Synapse 2020"). The Synapse 2020 report concludes as follows:

*While we found that PSE's own winter load forecast is above the load threshold for concern in King County, we cannot conclude based on the data we analyzed whether there is any clear need created by the winter peak load for transmission capacity expansion in the future. PSE's past winter peak load forecasts have been over-predicting winter peak loads. The current forecast does not appear to fully incorporate the declining trend in weather-normalized winter peaks. Further,*

*the current forecast does not appear to have incorporated the WUTC's recommendation to assume that in the longer term "a reasonable level of emerging retrofit conservation measures will be available in the market at cost-effective rates even though they cannot be accurately identified or predicted now."<sup>46</sup>*

<sup>46</sup> WUTC. 2018. Page 11.

As pointed out by Synapse, PSE once again defies the expertise of the WUTC and ends consideration of the effect of conservation efforts only ten years out, based on largely feigned uncertainty of their impact. While the Synapse report was dated 2020, its report was issued before the impact of the Covid-19 pandemic was known.

Synapse does point out that while there may be summer peak concerns, PSE does not recognize these concerns. In May, 2020, PSE was given WUTC approval to issue a Request for Proposals to reduce peak loads, one directed specifically at Demand Response, the other related to "All Sources." However, in September, PSE filed a motion with the WUTC to withdraw both RFPs. The motion was based on its new load forecast, which materially reduced the peak load forecast:

*At or around the end of July, 2020, PSE completed its process for updating its load forecast and developing the F2020 normal peak load forecast. Whereas the F2019 normal peak load forecast projected a substantial capacity need of 753 MW in 2026, the F2020 peak load forecast projects a more modest capacity need of 545 MW in 2026.*

Motion for Withdrawal, page 6. At page 7 of its motion, PSE indicated this reduction in peak load forecast justified withdrawing its prior efforts to reduce peak loads:

*PSE submitted that it has recently developed an updated load forecast that reflects the effects of the Covid -19 pandemic. This forecast indicates a significantly lower peak capacity need than the previous load forecast indicated for either the Draft Demand Response RFP or the Draft All-Source RFP.*

(Emphasis supplied.) PSE continued on page 10 of its motion:

*As demonstrated in Figure 2 above, the F2020 normal peak load forecast does not project a material capacity need for more than five years.*

(Emphasis supplied). PSE's belated recognition that peak loads are flat or declining is consistent with its own actual experience as identified by the WUTC in 2017. This trend of declining peaks goes back to 2012, when growth was already negative.

The Synapse report and PSE's own admissions now inform decision making on PSE's pending applications. CENSE anticipates that PSE will ask the jurisdictions where permits are still pending (such as Bellevue) to disregard the impact of declining peak loads because approvals for the project have previously been issued in South Bellevue and Renton (and because it has expended some \$88,000,000 thus far in permitting expenses). However, it was PSE's choice to fragment its project into several separate parts. Because each segment is separate, each must be separately reviewed, especially where no construction of transmission lines has yet occurred in any segment. More significantly, each segment must be reviewed based on current information, forecasts and electric usage, not that from 2013 or 2015, a virtual eternity from current conditions and circumstances.

Cancellation of pending transmission projects is not uncommon when needs can be met in other ways. For example, the Bonneville Power Administration cancelled its I-5 Corridor Reinforcement Project, an 80-mile, 500 kV transmission line in southwest Washington/northwest Oregon in May, 2017. See BPA's letter to stakeholders of their decision at:

[https://www.bpa.gov/Projects/Projects/I-5/Documents/letter\\_I-5\\_decision\\_final\\_web.pdf](https://www.bpa.gov/Projects/Projects/I-5/Documents/letter_I-5_decision_final_web.pdf).

That project also began in 2009, as a solution "*to preserve reliability, meet existing contract requirements, reduce curtailments, and serve demand on the transmission system - which at the time was growing.*" Letter at page 2 (emphasis supplied).

Moreover, the BPA recognized that "*recent trends indicate that load growth has generally slowed relative to what was assumed in prior studies.*" Page 2. Significantly, BPA relies on emerging technology to support its decision, including:

*Non-wires measures to manage generation and loads to reduce peak congestion will launch this summer. We also will look to use cutting-edge grid technologies such as battery storage and flow control devices to proactively manage congestion and further extend operational capacity of the existing system.*

Page 3. These factors are equally applicable to the PSE proposal, especially the decline in load growth.

It turns out that the Bellevue Council's adoption of Section 255 in 2008 was prescient in requiring that PSE address the need for the project during permitting. Section 255 correctly requires that PSE bear the burden of proof to meet the standards of the Bellevue code. It must establish that there is an "*operational need*" for the proposal and that it will enhance reliability of the system and the area in which it is proposed. Applying current standards and contemporary facts, it is impossible to argue that there is an operational need for the project when, seven years after it was so urgently proposed, PSE has still not even bothered to apply for all segments of its own project.



May 27, 2021  
Page 15

Time has shown that, intentional or not, PSE's deliberate delay in pursuing the EE project was the correct decision. If PSE does not cancel the project voluntarily, then the City should decline to approve a project that is not justified under its codes when peak demand is declining.

Thank you for this opportunity to comment on this proposal.

Sincerely,

A handwritten signature in blue ink, reading "J. Richard Aramburu". The signature is written in a cursive style with a large, stylized initial "J".

J. Richard Aramburu

JRA:cc

cc: Clients

# Attachment A

## **20.20.255 Electrical utility facilities.**

### **A. Purpose.**

The purpose of this section is to regulate proposals for new or expanding electrical utility facilities and to minimize impacts associated with such facilities on surrounding areas through siting, design, screening, and fencing requirements.

### **B. Applicability.**

This section applies to all proposals for new or expanding electrical utility facilities as defined in LUC [20.50.018](#). Additional requirements applicable to electrical utility facilities located within the Shoreline Overlay District are provided in Part [20.25E](#) LUC.

### **C. Required Review.**

For new or expanding electrical utility facilities proposed on sensitive sites as described by Figure UT.5a of the Utilities Element of the Comprehensive Plan, the applicant shall obtain Conditional Use Permit approval under Part [20.30B](#) LUC. For expansions of electrical utility facilities not proposed on sensitive sites as described by Figure UT.5a, the applicant shall obtain Administrative Conditional Use Permit approval under Part [20.30E](#) LUC.

1. Conditional Use Permit. In addition to the requirements set forth in Part [20.30B](#) LUC and Part [20.25B](#) LUC (if applicable), the applicant shall:
    - a. Complete the alternative siting analysis as set forth in subsection [D](#) of this section;
    - b. Hold an informational public meeting prior to the public hearing required by LUC [20.35.137](#) and in addition to the informational public meeting required in LUC [20.35.127](#); and
    - c. Comply with all applicable decision criteria and design standards set forth in this section.
  2. Administrative Conditional Use. In addition to the requirements set forth in Part [20.30E](#) LUC and Part [20.25B](#) LUC (if applicable), the applicant shall comply with all
- 
- The Bellevue Land Use Code is current through Ordinance 6568, passed February 16, 2021.

decision criteria and design standards set forth in this section, provided the applicant is not required to complete the alternative siting analysis set forth in subsection [D](#) of this section.

**D. Alternative Siting Analysis.**

In addition to the requirements set forth in Part [20.30B](#) LUC, Part [20.25B](#) LUC (if applicable), and the decision criteria and design standards set forth in this section, the applicant shall identify alternative sites, provide required content showing analysis relating to identified sites, describe technologies considered, and describe community outreach conducted for proposals relating to new or expanding electrical utility facilities on sensitive sites as described in this section.

1. **Alternative Sites Analyzed.** Prior to submittal of the application for Conditional Use Permit required pursuant to subsection [C](#) of this section, the applicant shall identify not less than three alternative site options to meet the system needs for the proposed new or expanding electrical utility facility. At least one of the alternative sites identified by the applicant shall be located in the land use district to be primarily served by the proposed electrical utility facility.
2. **Content of Alternative Siting Analysis.** Upon submittal of the Conditional Use Permit application required pursuant to subsection [C](#) of this section, the applicant shall submit results of the siting analysis which:
  - a. Describe the sites identified in subsection [D.1](#) of this section and the land use districts within which the sites are located.
  - b. Map the location of the sites identified in subsection [D.1](#) of this section and depict the proximity of the sites to Neighborhood Business Land Use Districts, Residential Land Use Districts, and Transition Areas.
  - c. Describe which of the sites analyzed are considered practical or feasible alternatives by the applicant, and which of the sites analyzed are not considered practical or feasible, together with supporting information that justifies the conclusions reached. For sites located within a Neighborhood Business Land Use

District, Residential Land Use District, and/or Transition Area (including the BelRed Office/Residential Transition (BR-ORT), the applicant shall:

- i. Describe whether the electrical utility facility location is a consequence of needs or demands from customers located within the district or area; and
- ii. Describe whether the operational needs of the applicant require location of the electrical utility facility in the district or area.

d. Identify a preferred site from the alternative locations considered for the proposed new or expanding electrical utility facility. The following location selection hierarchy shall be considered during identification of the preferred site alternative: (i) nonresidential land use districts not providing transition, (ii) nonresidential Transition Areas (including the BelRed Office/Residential Transition (BR-ORT), and (iii) residential areas. The applicant may identify a preferred site alternative in a Residential Land Use District or Transition Area (including the BelRed Office/Residential Transition (BR-ORT) upon demonstration that the location has fewer site compatibility impacts than a nonresidential land use district location.

3. Technology Considered for the Preferred Site Alternative. Upon submittal of the Conditional Use Permit application required pursuant to subsection [C](#) of this section, the applicant shall:

- a. Describe the range of technologies considered for the proposed electrical utility facility;
- b. Describe how the proposed electrical utility facility provides reliability to customers served;
- c. Describe components of the proposed electrical utility facility that relate to system reliability; and
- d. Describe how the proposed facility includes technology best suited to mitigate impacts on surrounding properties.

4. Community Outreach Conducted. Upon submittal of the Conditional Use Permit application required pursuant to subsection [C](#) of this section, the applicant shall provide a description of all methods of community outreach or involvement conducted by the applicant prior to selecting a preferred site for the proposed electrical utility facility.

**E. Decision Criteria.**

In addition to the requirements set forth in Part [20.30B](#) LUC, Part [20.30E](#) LUC, Part [20.25B](#) LUC (if applicable), and other applicable provisions of this section, all proposals to locate or expand electrical utility facilities shall comply with the following:

1. The proposal is consistent with Puget Sound Energy's System Plan;
2. The design, use, and operation of the electrical utility facility complies with applicable guidelines, rules, regulations or statutes adopted by state law, or any agency or jurisdiction with authority;
3. The applicant shall demonstrate that an operational need exists that requires the location or expansion at the proposed site;
4. The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole, as certified by the applicant's licensed engineer;
5. For proposals located on sensitive sites as referenced in Figure UT.5a of the Utility Element of the Comprehensive Plan, the applicant shall demonstrate:
  - a. Compliance with the alternative siting analysis requirements of subsection [D](#) of this section;
  - b. Where feasible, the preferred site alternative identified in subsection [D.2.d](#) of this section is located within the land use district requiring additional service and residential land use districts are avoided when the proposed new or expanded electrical utility facility serves a nonresidential land use district;

6. The proposal shall provide mitigation sufficient to eliminate or minimize long-term impacts to properties located near an electrical utility facility.

#### **F. Design Standards.**

In addition to the requirements set forth in Part [20.30B](#) LUC, Part [20.30E](#) LUC, Part [20.25B](#) LUC (if applicable), and other applicable provisions of this section, all proposals to locate or expand an electrical utility facility shall comply with the following:

1. **Site Landscaping.** Electrical utility facilities shall be sight-screened as specified in LUC [20.20.520.F.2](#) or as required for the applicable land use district. Alternatively, the provisions of LUC [20.20.520.J](#) may be used, provided this subsection does not apply to transmission lines as defined in LUC [20.50.018](#);
2. **Fencing.** Electrical utility facilities shall be screened by a site-obscuring fence not less than eight feet in height, provided this subsection does not apply to transmission lines as defined in LUC [20.50.018](#). This requirement may be modified by the City if the site is not considered sensitive as referenced in Figure UT.5a of the Utility Element of the Comprehensive Plan, is adequately screened by topography and/or existing or added vegetation, or if the facility is fully enclosed within a structure. To the maximum extent possible, all electrical utility facility components, excluding transmission lines, shall be screened by either a site-obscuring fence or alternative screening;
3. **Required Setback.** The proposal (including required fencing) shall conform to the setback requirement for structures in the land use district; and
4. **Height Limitations.** For all electrical utility facility components, including transmission lines, the City may approve a request to exceed the height limit for the underlying land use district if the applicant demonstrates that:
  - a. The requested increase is the minimum necessary for the effective functioning of the electrical utility facility; and
  - b. Impacts associated with the electrical utility facility have been mitigated to the greatest extent technically feasible.

#### **G. Mitigation Measures.**

The Bellevue Land Use Code is current through Ordinance 6568, passed February 16, 2021.

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The City may impose conditions relating to the location, development, design, use, or operation of an electrical utility facility to mitigate environmental, public safety, or other identifiable impacts. Mitigation measures may include, but are not limited to, natural features that may serve as buffers, or other site design elements such as fencing and site landscaping as provided for in subsection [E](#) of this section.

#### H. **Independent Technical Review.**

The City may require the applicant pay for independent technical review by a consultant retained by the City for review of materials submitted by the applicant to demonstrate compliance with the requirements of the alternative siting analysis contained in subsection [D](#) of this section, the decision criteria contained in subsection [E](#) of this section and the design standards contained in subsection [F](#) of this section. (Ord. 6417, 5-21-18, § 16; Ord. 5876, 5-18-09, § 11; Ord. 5805, 3-3-08, § 8)

### **The Bellevue Land Use Code is current through Ordinance 6568, passed February 16, 2021.**

Disclaimer: The City Clerk's Office has the official version of the Bellevue Land Use Code. Users should contact the City Clerk's Office for ordinances passed subsequent to the ordinance cited above.

**Note:** This site does not support Internet Explorer. To view this site, Code Publishing Company recommends using one of the following browsers: Google Chrome, Firefox, or Safari.

[City Website: www.bellevuewa.gov](http://www.bellevuewa.gov)

City Telephone: (425) 452-6800

[Code Publishing Company](#)



**Pittman, Reilly**

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**From:** Rick Aramburu <Rick@aramburu-eustis.com>  
**Sent:** Thursday, May 27, 2021 1:02 PM  
**To:** Bedwell, Heidi  
**Cc:** Stead, Elizabeth; Warren Halvorsen; hansennp@aol.com; Karen Esayian; Hummer, Betsi; Dhananjaya, Hassan; Epstein, Ron; Gooding, Ross; Kasner, Steve; EBCC; Loretta Lopez; Don Marsh  
**Subject:** City Presentation at the EBCC Courtesy Meeting

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Heidi:

Your email of yesterday (below) has been forwarded to me by one of the recipients.

In your email, you say that "Staff will provide an overview of the process, . . ." In that staff overview, CENSE requests that you address the following subject.

EBCC has previously considered PSE's 148<sup>th</sup> overhead transmission line, a 2.89 mile, 115 kV line connecting two substations. The transmission line is only partially within EBCC's area. EBCC disapproved the transmission line within its jurisdictional area.

EBCC's decision was appealed by PSE to Superior Court; it then appealed the Superior Court's denial of its petition to the Court of Appeals. The City was a party to the case.

The Court of Appeals unpublished decision contains the language set forth below at page 21-22.

EBCC's decision on that part of the North Segment within its jurisdiction will have an impact on the larger North Segment. Because of this, CENSE asks whether the City will argue that EBCC's decision would be an improper or illegal extraterritorial decision as it did in *PSE v. EBCC* in 2017 and requests that the City explain its position on this subject during the Staff presentation on June 1. The City position on this subject will be important to EBCC and residents within EBCC's jurisdictional area.

Thank you in advance for your explanation of the City's position on this important matter. If you have any questions, please contact the undersigned.

Rick

//

*Text from Court of Appeals unpublished decision in PSE v. EBCC, No. 74464-0-1 (January 30, 2017), pages 21-22. (Footnotes omitted)*

Here, the EBCC exercised its authority to disapprove within its jurisdiction the conditional use permit authorized by Bellevue. Thus, the primary question is whether there was room for the EBCC to exercise its discretion in doing so.

PSE argues, for the first time in its reply brief, that the EBCC "asserts the right to unilaterally affect the reliability of power to Bellevue homeowners outside its territory." Because PSE makes this argument for the first time in its reply brief, it is too late for us to consider. We decline to do so.

However, Bellevue makes a similar argument as a respondent. It argues that the EBCC's decision, if left standing, would have an extraterritorial affect because it will affect citizens outside the EBCC's area.

As we discussed earlier in this opinion, the area over which EBCC has jurisdiction is bounded on the north by NE 8th Street. The area includes 148th Avenue S.E., and the service area for the two substations to be linked by the project are only partially within the EBCC's area.

[RCW 35.14.040](#) provides that the EBCC's disapproval "shall not affect the application of any ordinance or resolution affecting areas outside the community municipal corporation." Because we hold that PSE has met its burden to show that the EBCC's resolution is improper, we need not also decide whether the resolution violates the geographical limitations of this statute. Accordingly, that is an issue left for decision another day.

**From:** "Bedwell, Heidi" <HBedwell@bellevuewa.gov>  
**Date:** May 26, 2021 at 4:18:23 PM PDT  
**To:** Loretta Lopez <llopez@mstarlabs.com>  
**Cc: Subject: RE: Presentation at the EBCC Courtesy Meeting**

Hi Loretta,

I'll try to address all of your questions in this one email response rather than sending separate emails.

I'm glad to hear the direct mailing finally arrived at your home. I was told the printing center located at city hall had to send the job out for printing so there was a delay in dropping into the mail. As was communicated previously, the required public meeting for Process III decisions is combined with the EBCC monthly meeting. The EBCC refers to these meetings as Courtesy Hearings but it's not a hearing in the sense of a decision being made. Refer to the EBCC agenda for packet information <https://bellevue.legistar.com/MeetingDetail.aspx?ID=868854&GUID=10B249A5-A5D0-4B98-AA80-9AAEFBAD3EC3&Options=info|&Search=> The format is similar to the other meetings we've held. Staff will provide an overview of the process, PSE will provide an overview of their project, there will be a period where interested parties can give comment, then the Council will ask questions.

Again like the other permitting processes you have been involved with this isn't the only opportunity to provide comments on the project because this meeting is early in the process. Comments are welcome throughout the land use review process and are accepted up until staff prepares Director's decision on the Critical Areas Land Use Permit and at any time prior to the closing of the public hearing record on the Conditional Use Permit. The notice which had a May 27<sup>th</sup> date for comment is the minimum comment period (14 days) the city is required to have. Again, comments are welcome throughout the process and they will be part of the record provided to the City Council and EBCC when they make their decisions. Finally, just like the last CUP for the South Segment, the city will hold another informational public meeting before holding the hearing on the Director's recommendation with the hearing examiner. The timing and location of that meeting is yet to be determined. I'd suggest you look closely at the project web page for detailed information about the project and process. I believe much of what you are looking for can be found on this page <https://bellevuewa.gov/city-government/departments/development/zoning-and-land-use/public-notices-and-participation-2>  
-Heidi



**Heidi M. Bedwell** (She/Her)

Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[How are we doing?](#)

*With the appearance of new cases of the COVID-19 virus in King County the Development Services Permit Center has been temporarily closed to walk-in customers and we are requiring residents and customers to use online city resources at <http://development.bellevuewa.gov>.*

---

**From:** Loretta Lopez <llopez@mstarlabs.com>

**Sent:** Wednesday, May 26, 2021 11:27 AM

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

**Cc:** Stead, Elizabeth <estead@bellevuewa.gov>; Warren Halvorsen <whalvrsn1@frontier.com>; hansennp@aol.com; Karen Esayian <kesayian@aol.com>

**Subject:** Re: Presentation at the EBCC Courtesy Meeting

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi Heidi,

I meant to ask in my previous message above if the City will present any written material at the EBCC courtesy meeting on June 1? If so, will the documents be available on a link to the EBCC packet? If not, then how can we review them in advance of the meeting?

Thank you.

Loretta

On Wed, May 26, 2021 at 11:11 AM Loretta Lopez <llopez@mstarlabs.com> wrote:

Hi Heidi,

Are you going to make a presentation at the EBCC meeting in addition to PSE?

Thank you.

Loretta

## Pittman, Reilly

---

**From:** Bedwell, Heidi  
**Sent:** Wednesday, May 12, 2021 10:19 AM  
**To:** 'Lori E'  
**Subject:** RE: Comments on PSE's Energize Eastside permit application

Hi Lori,

The notice of application and first public meeting is being prepared this week. We have updated our webpage <https://bellevuewa.gov/city-government/departments/development/zoning-and-land-use/public-notice-and-participation-2> and will be sending out an alert to all who have subscribed and our interested parties list. Thanks for your continued interest and participation in the process. Note that the East Bellevue Community Council refers to the public meetings held during their monthly meetings as courtesy hearings. This however is not a decision point like a hearing but is rather a first introduction to the project. I suspect this naming of the meeting may cause others confusion as well.



**Heidi M. Bedwell** (She/Her)  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[How are we doing?](#) 👍👎

*With the appearance of new cases of the COVID-19 virus in King County the Development Services Permit Center has been temporarily closed to walk-in customers and we are requiring residents and customers to use online city resources at <http://development.bellevuewa.gov>.*

---

**From:** Lori E <ljdemail@comcast.net>  
**Sent:** Wednesday, May 12, 2021 10:08 AM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Subject:** Fwd: Comments on PSE's Energize Eastside permit application

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi Ms Bedwell,

I have asked to be **"party of record"** and also requested to be notified when any Bellevue public hearing is announced for **PSE's Energize Eastside**. If the city has announced this and fails to notify citizens or interested "party of record" participants then that is a failure to the public process. I have been waiting, I would presume I will be notified as requested in the following email on April 13, 2018. Please continue to keep me posted.

Sincerely,

Lori Elworth

Begin forwarded message:

**From:** Lori E <[ljdemail@comcast.net](mailto:ljdemail@comcast.net)>  
**Subject:** Comments on PSE's Energize Eastside permit application  
**Date:** April 13, 2018 at 12:52:43 PM PDT  
**To:** [HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)

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

## Pittman, Reilly

---

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