

Bedwell, Heidi

From: Don Marsh <donmarsh@cense.org>
Sent: Wednesday, November 14, 2018 10:20 AM
To: Bedwell, Heidi
Subject: CENSE response to PSE's answers
Attachments: Energize Eastside additional comments.pdf

Dear Ms. Bedwell,

Please see the attached document which briefly describes the shortcomings of PSE's recent responses to the City regarding Energize Eastside. PSE fails to address issues of need, siting, alternatives, and mitigation required by Bellevue's land use code. We can provide clarification if our concerns raise questions for city officials or the applicant.

Sincerely,

Don Marsh

November 14, 2018

Heidi Bedwell
Environmental Planning Manager City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

RE: PSE's response to City's questions about the South Bellevue Segment Energize Eastside

Dear Ms. Bedwell,

On October 26, PSE responded to Bellevue's request for "additional comments" in an email from Bradley Strauch. Mr. Strauch's responses do not provide specific data that is required to fulfill the requirements of Bellevue's land use code:

- LUC 20.20.255.1 states: "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." According to the 2015 report by Bellevue's independent analyst, Utility System Efficiencies, the project is required to serve increasing block loads in downtown Bellevue and the developing Spring District. PSE has not identified an alternative site located in these districts. If it is not practical to site a transmission line in these areas, other utilities have demonstrated that peak demand can be mitigated using some combination of energy storage, solar panels, combined heat and power, demand response, and advanced energy efficiency. PSE must show verifiable studies of the combined application of these technologies located in the districts that are producing additional demand for electricity.
- LUC 20.20.255.2.c.i states that the applicant must "Describe whether the electrical utility facility location is a consequence of needs or demands from customers located within the district or area." The proposed transmission line runs through mostly residential neighborhoods in Newport Hills, Somerset, Eastgate, Lake Hills, and Bridle Trails. PSE has not conclusively shown that the "needs or demands from customers" in these neighborhoods require an ultra-high-voltage transmission line to be installed within yards of homes, parks, churches, and schools. PSE must demonstrate the need by releasing records of peak demand for each Eastside substation. For each substation, we ask to see peak summer and winter demand for the past ten years (twenty data points for each substation). PSE claims that this small set of data would expose confidential customer information. It is not possible to derive information about individual customers from 20 data points, when each substation serves thousands of customers.
- LUC 20.20.255.2.d describes a site selection hierarchy: "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 Bel-Red Office/Residential Transition (BR-ORT), and (iii) residential areas." During the site selection process conducted by PSE's Community Advisory Group,

PSE never offered alternative sites in the preferred categories. No route option was offered that minimized impact on residential areas, as required by this code.

- LUC 20.20.255 D.3.d requires the applicant to “Describe how the proposed facility includes technology best suited to mitigate impacts on surrounding properties.” PSE has only described using shorter poles (but more of them), different pole designs, and different colors of paint for the poles. These are, at best, cosmetic mitigations for nearby properties. Bellevue residents are concerned about safety impacts. In October, a natural gas pipeline exploded in Canada, for reasons that aren’t yet understood. PSE proposes to “hand dig” the foundations of its transmission poles within feet of 50-year-old petroleum pipelines. Is that sufficient to mitigate the potentially life-threatening risk of a pipeline explosion for nearby homes and schools?
- LUC 20.20.255 D.3.b-c ensures that electrical facilities improve reliability: “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.” The question of reliability is even more clearly stated in LUC 20.20.255 E.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.” In Bellevue’s 2016 Electrical Reliability Workshop, PSE representative Andy Swayne clearly stated that “Energize Eastside will not improve [reliability metrics] SAIDI and SAIFI for any neighborhood in Bellevue or the system as a whole.” Although CENSE agrees that PSE is required by federal standards to provide reliability in scenarios where the system is “reasonably stressed,” PSE has justified the project using a high-stress scenario that is so unlikely to happen, it can’t be measured using standard reliability metrics like SAIDI and SAIFI. To allow full understanding of the reliability scenario Energize Eastside is intended to address, PSE must provide full access to Quanta’s load flow study that identified the reliability issue. We ask that our experts be allowed to perform a critical review of this important study.

CENSE asks the City of Bellevue to require PSE to provide data to address these concerns and establish a clear factual basis for the Energize Eastside project. It would be a waste of time and taxpayer resources to hold a public hearing before these issues are adequately answered.

Sincerely,



Don Marsh, President
CENSE.org

Bedwell, Heidi

From: Kristi Weir <khweir@hotmail.com>
Sent: Wednesday, October 31, 2018 7:42 PM
To: Bedwell, Heidi
Subject: Comments on PSE's Energize Eastside permit application

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Bedwell,

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

1. It is unnecessary and wasteful of ratepayer funds.
PSE had not offered any confirmable data to support the need for this project. While PSE asserts (no data provided) that our energy need on the Eastside is growing at 2.4%. PSE's own data show electricity consumption in Bellevue to be FALLING—not rising. Why should taxpayers have to pay for a project that is not needed.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines.
3. It damages communities and the environment by removing thousands of valuable urban trees and increases green house gas emissions as PSE relies on fossil based fuels for 60% of its energy.
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid.

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

Sincerely,

Kristi Weir
[4639 133rd Ave SE
Bellevue WA 98006]

Bedwell, Heidi

From: Richard Lauckhart <lauckjr@hotmail.com>
Sent: Saturday, November 17, 2018 5:02 PM
To: Bedwell, Heidi; Dave Van De Weghe; jding@rentonwa.gov
Cc: Chelminiak, John; Robinson, Lynne; Lee, Conrad; Nieuwenhuis, Jared; Robertson, Jennifer S.; Stokes, John; Zahn, Janice; lindan@newcastlewa.gov; carols@newcastlewa.gov; allend@newcastlewa.gov; gordonb@newcastlewa.gov; davem@newcastlewa.gov; tamrak@newcastlewa.gov; tomm@newcastlewa.gov; robw@newcastlewa.gov; steveo@newcastlewa.gov; rcorman@rentonwa.gov; rmcirvin@rentonwa.gov; apavone@rentonwa.gov; rperez@rentonwa.gov; dpersson@rentonwa.gov; eprince@rentonwa.gov; cwitschi@rentonwa.gov
Subject: WUTC failure to protect PSE customers
Attachments: Comments to Cities re WUTC failures.pdf

Heidi, Dave and Jill-

Please include this email and its attachment in your respective city files on the PSE CUP Application for Energize Eastside. This email and its attachment is in furtherance of my comments previously provided to you in which I provide compelling evidence that Energize Eastside is not needed.

The attachment to this email demonstrates that the WUTC is not protecting the interest of PSE customers including those residents of your cities. You need to protect the interest of PSE customers living in your cities. A start in protecting PSE customers who live in your city is to reject the PSE Application for a CUP permit for Energize Eastside.

Richard Lauckhart
Energy Consultant
44475 Clubhouse Drive
Davis, Ca 95618

Comments by Lauckhart on the WUTC failure to protect PSE customers...you need to do that yourself

November 17, 2018

As you know, PSE has created a major controversy by attempting to build a huge 18-mile transmission line through 5 cities east of Lake Washington. They call the project Energize Eastside. I have provided compelling evidence to you that this line is not needed and should not be permitted. I have pointed out that the incentive for PSE to build this unneeded line is to enhance the profits of its foreign owners. PSE is nonetheless marching ahead trying to get you to permit this line despite these obvious problems.

When the City of Bellevue asked PSE to provide more information on the justification for the line, PSE advised the City of Bellevue that *“PSE is a heavily regulated investor-owned utility whose actions are carefully monitored and reviewed by the Washington Utilities and Transportation Commission (UTC).”*

In essence, PSE is telling the City of Bellevue that they need not delve into technical matters because that is being done by the WUTC.

But that is not true. The WUTC is failing to protect PSE customers including those PSE customers that live in your cities. More specifically:

1. THE PSE INTEGRATED RESOURCE PLAN (IRP): The WUTC requires PSE to develop an IRP every two years. The purpose of this plan is to investigate PSE power and transmission needs in a process that includes stakeholder input. If there is evidence that there might be a problem in the near future, the IRP is supposed to trigger an investigation of alternatives to solve any problems. I participated in the last PSE IRP to address the transmission needs. PSE refused to answer questions about their need for Energize Eastside. That refusal was brought to the attention of the WUTC. So, the WUTC wrote an “Acknowledgement Letter” to PSE telling them, in effect, they did not properly do their IRP and they needed to do better in the future. The WUTC did not require them to fix their IRP. That is hardly "carefully monitored and reviewed" regulation.

2. THE OWNERSHIP TRANSFER PROCEEDING (OTP): Macquarie, the key member of the foreign ownership group that purchased all of PSE common stock in 2009, ran in to serious financial problems this year and has entered into an agreement to sell its ownership share of PSE to Canadian Pension fund managers. Macquarie needs to get WUTC approval of that sale. That presents another opportunity for the WUTC to investigate what PSE is doing under foreign ownership and to place “conditions” on their approval of that sale that stops PSE abuses of its Transmission Planning activity, including PSE failure to properly perform an IRP. The WUTC set an Adjudicative Proceeding to take testimony on that proposed ownership transfer in order to see if they should put conditions on their approval in order to protect PSE customers. The WUTC said that only formal parties to that proceeding could weigh in on the matter. I made a

request to the WUTC to become a formal party to that proceeding in order to testify about the abuses the PSE had made to the Transmission Planning process so that the WUTC could put “conditions” on their approval of the sale that would protect PSE customers from these continuing abuses that are driven by the desire of the foreign owners to fund their pension plan obligations. The WUTC decided they did not want to hear my testimony on that matter and denied my request to become an intervenor.

The bottom line for your three cities is that you are on your own in protecting the public that lives in your city. Despite PSE claims that the WUTC is carefully monitoring and reviewing their actions, it is clear that the WUTC is not doing that.

I have provided your cities compelling evidence that the Energize Eastside line is not needed. You need to protect your citizens by rejecting their Conditional Use Permit Applications. The WUTC is not protecting your citizens.

No wonder there is continuing discussion of kicking PSE and its WUTC regulators out and creating Public Utility Districts.

Bedwell, Heidi

From: Roger Karen Orth <rkorth@comcast.net>
Sent: Saturday, November 17, 2018 9:40 AM
To: Bedwell, Heidi
Cc: Dave Mickelson (Neighbor)
Subject: Comment on PSE's CUP Application, Energize Eastside

As a registered Electrical Engineer in the State of Washington, I have yet to see why the project is needed. I have listened to PSE presentations and those of CENSE and have reached the conclusion that PSE is exaggerating the need and not taking into account power saving techniques being implemented by the public (e.g., LED lighting) nor advances in power storage technology (e.g., battery development/storage capacity to be used to offset peak loading).

1. The project justification appears to be biased by PSE need to show significant profit.
2. CENSE trade studies have shown that the PSE analysis cases are extreme worst case with power need growth rates that do not match recent trends and emphasis to support Canadian power needs during a Seattle/Bellevue crisis scenario. In addition PSE does not consider logical workarounds during their catastrophic scenario.
3. Impacting residential areas (degrading the character, appearance and quality of subjected property) should certainly be the last choice, as demanded by Bellevue Land Use Codes (LUC 20.20.255 and 20.30B.140)
4. New battery storage capabilities are coming online in other cities to provide power reliability during peak load intervals. For example look at the Redox Flow Battery Research being conducted in Mukilteo, WA and being tested in multiple parts of the world.

PSE's project application should be denied.

Sincerely,

Roger W Orth
4530 Somerset Drive SE
Bellevue, WA 98006

Bedwell, Heidi

From: Rick Aramburu <rick@aramburu-eustis.com>
Sent: Wednesday, November 21, 2018 10:03 AM
To: Bedwell, Heidi
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Heidi:

Thank you for the update. Given the long delay with this project, we would appreciate notice well in advance of the actual hearing as my schedule is very full in January. As you know, the present PSE application is still only for half the project and if the City intends to move forward, we may ask the hearing officer to continue the matter until the second (north segment) application is made.

Can you tell us when the application for the north segment will be made? It is inconceivable to us that a utility as large as PSE does not have a schedule for this application.

Rick

J. Richard Aramburu
ARAMBURU & EUSTIS, LLP
720 Third Avenue
Pacific Building Suite **2000**
Seattle, WA 98104-1860
Telephone (206) 625-9515
Facsimile (206) 682-1376

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

From: Bedwell, Heidi [mailto:HBedwell@bellevuewa.gov]
Sent: Wednesday, November 21, 2018 9:29 AM
To: Rick Aramburu
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Still waiting on the final response to comments from PSE. Have not been given an indication of when we might receive them. Again, when I do I'll be happy to pass along.

Note that I updated the city's webpage to remove references about a potential hearing date in early November. As we are still preparing the staff recommendation we don't have a precise date yet but we are hopeful we will be holding the hearing in January. As soon as we are certain on a date we will update the webpage and share that with you as well.

Have a happy thanksgiving!

Sincerely,
-Heidi



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

From: Rick Aramburu <rick@aramburu-eustis.com>
Sent: Wednesday, November 21, 2018 7:07 AM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Heidi:

Has PSE provided any response to the public comments? Do you have any indication when we might receive them?

Thanks and have a good Thanksgiving.

Rick

J. Richard Aramburu
ARAMBURU & EUSTIS, LLP
720 Third Avenue
Pacific Building Suite 2000
Seattle, WA 98104-1860
Telephone (206) 625-9515
Facsimile (206) 682-1376

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

From: Bedwell, Heidi [<mailto:HBedwell@bellevuewa.gov>]
Sent: Wednesday, November 14, 2018 3:13 PM
To: Rick Aramburu
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Mr. Aramburu,

I have not received any additional response to public comment at this time. When I do I will be happy to pass along to you.

The City of Bellevue will process our permit with the information available at the time. If for some reason we have not completed our review and the City of Newcastle has additional relevant information to this project we'd certainly appreciate reviewing this document and will consider as part of our decision making. At this time the city will be proceeding with our permitting process with the information available.

Thank you as always for your continued interest in this project and permitting.

Sincerely,
Heidi



Heidi M. Bedwell

Environmental Planning Manager, Land Use Division
Development Services Department
425-452-4862

www.bellevuewa.gov and www.mybuildingpermit.com

From: Rick Aramburu <rick@aramburu-eustis.com>
Sent: Monday, November 12, 2018 11:19 AM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Heidi:

Thank you for your response.

Has PSE provided a response to the public comments? If so, please send along.

In addition, we have learned that the City of Newcastle has extended a contract offer to a consultant for the EE project. We understand that the work will include a peer review of PSE's needs assessment reports, plus an evaluation of non-wire alternatives and energy storage. This work will inform the process of review of the EE project under the Newcastle ordinance that regulates the EE application; as you know, that ordinance is substantially similar to the Bellevue ordinance (BCC 20.20.255).

Given this important work, CENSE believes the work of the Newcastle consultant should be available to Bellevue staff prior to preparing the staff report on EE proposal in Bellevue. Would the City agree?

The work underway in Newcastle further highlights the folly of moving forward with a review of just the south segment of the overall PSE proposal. We have written the city several times about this issue, but as we move into 2019, the lack of an application for the north segment and PSE's insistence that the City only look at part of the project, seems intentional and strategic on their part. We note that PSE promised the north application by the spring of this year and not only has PSE failed in their prior commitment, they stubbornly refuse to even say when the application will be filed. Once again, the City should not proceed with review of only part of the project pending receipt of the north segment application.

Thank you for consideration of our views.

Rick

J. Richard Aramburu
ARAMBURU & EUSTIS, LLP
720 Third Avenue
Pacific Building Suite 2000
Seattle, WA 98104-1860
Telephone (206) 625-9515
Facsimile (206) 682-1376

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

From: Bedwell, Heidi [<mailto:HBedwell@bellevuewa.gov>]
Sent: Tuesday, October 30, 2018 6:54 AM
To: Rick Aramburu
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Good Morning Mr. Aramburu,

The attached document was also uploaded to the city's permitting page. PSE has not provided a response to the public comments attached to the original communication.

-Heidi



Heidi M. Bedwell

Environmental Planning Manager, Land Use Division
Development Services Department
425-452-4862
www.bellevuewa.gov and www.mybuildingpermit.com

From: Rick Aramburu <rick@aramburu-eustis.com>
Sent: Monday, October 22, 2018 1:24 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Heidi:

Thank you for your prompt response. We look forward to the opportunity to review additional materials.

Rick

J. Richard Aramburu
ARAMBURU & EUSTIS, LLP
720 Third Avenue
Pacific Building Suite 2000
Seattle, WA 98104-1860
Telephone (206) 625-9515
Facsimile (206) 682-1376

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

From: Bedwell, Heidi [<mailto:HBedwell@bellevuewa.gov>]
Sent: Monday, October 22, 2018 1:09 PM
To: Rick Aramburu
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Mr. Aramburu,

See the attached document outlining our additional questions asked of PSE. The email communication also included the remaining attachments. We have not received a response to this additional request. We have however received the remaining items from the original request back in August. I am awaiting electronic copies of these documents so they can be posted to the permit webpage.

-Heidi



Heidi M. Bedwell

Environmental Planning Manager, Land Use Division
Development Services Department
425-452-4862
www.bellevuewa.gov and www.mybuildingpermit.com

From: Rick Aramburu <rick@aramburu-eustis.com>
Sent: Saturday, October 20, 2018 7:48 AM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Heidi:

Just a quick reminder that we like to see the follow-up questions you asked PSE, referenced below. Of course, we would also want to see PSE's responses.

Thank you.

Rick

J. Richard Aramburu
ARAMBURU & EUSTIS, LLP
720 Third Avenue
Pacific Building Suite **2000**
Seattle, WA 98104-1860
Telephone (206) 625-9515
Facsimile (206) 682-1376

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

From: Bedwell, Heidi [<mailto:HBedwell@bellevuewa.gov>]
Sent: Thursday, October 18, 2018 7:16 AM
To: Rick Aramburu
Subject: RE: City review of PSE's 230 kV proposal (south Segment)

Mr. Aramburu,

We are still waiting for additional information from PSE in response to our August comment letter. When the documents have been received these will also be uploaded to the project permit page. You will be able to access the documents [here](#).

We did forward your letter to the PSE permit contact and we have asked some follow-up questions as well. We are still waiting for a response to our communication.

Finally, we appreciate the notification about your availability in the month of December. We are still assessing the timing of the hearing relative to a potential notice of director's recommendation. However, this email confirms that the City will not schedule a hearing during the time you will be out of the office (December 4-15).

-Heidi



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

From: Rick Aramburu <rick@aramburu-eustis.com>
Sent: Friday, October 12, 2018 2:09 PM
To: Bedwell, Heidi <HBedwell@bellevuewa.gov>
Cc: Loretta Lopez <loretta@mstarlabs.com>; 'Karen Esayian' <kesayian@aol.com>
Subject: City review of PSE's 230 kV proposal (south Segment)

Heidi:

I have been forwarded your email below. Can you provide an update on whether you are still awaiting this specific material? Can you provide us with the additional material when received?

In addition, I asked in an October 4 email to that the city require that PSE answer the questions concerning peak demand on the system which was the subject of your August 14, 2018 letter. Have you asked for this information and, if so, what was the PSE response?

I will be out of the office from **December 4 through December 15** so I request hearings not be held during this period.

Thank you.

Rick

From: "Bedwell, Heidi" <HBedwell@bellevuewa.gov>
Date: October 4, 2018 at 10:21:38 AM PDT
To: Karen Esayian <kesayian@aol.com>
Cc: "llopez@mstarlabs.com" <llopez@mstarlabs.com>
Subject: RE: Are all questions answered with PSE's 9/21 EE updates?

I am still reviewing the submitted documents as well as waiting for two specific responses: vegetation management and critical areas mitigation. Once I have received all information and completed my review I'll have a better sense if we'll be asking for more information.

Heidi

J. Richard Aramburu

ARAMBURU & EUSTIS, LLP

720 Third Avenue

Pacific Building Suite **2000**

Seattle, WA 98104-1860

Telephone (206) 625-9515

Facsimile (206) 682-1376

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

destroy the message. Thank you.