energizeEASTSIDE

PUGET SOUND ENERGY

Conditional Use Permit
Comment Response Summary

As requested by the city of Bellevue, PSE is providing the following in response to the public comments submitted to the city as they relate to the Energize Eastside Conditional Use Permit and Critical Areas Permit.

The comments are addressed by general topic as the majority were addressed as part of the related Environmental Impact Statement public comment process. Unique comments that have not been answered previously are also addressed below or in the accompanying letter to the City.

Background

Electricity is currently delivered to the Eastside area[1] through two 230 kV/115 kV bulk electric substations – Sammamish substation in Redmond and Talbot Hill substation in Renton. The electricity is then distributed to neighborhood distribution substations using the many 115 kV transmission lines located throughout the area. Although PSE has made many 115 kV system improvements in the Eastside area over the years, the primary 115 kV lines that connect the Sammamish (Redmond) and Talbot Hill (Renton) substations to the Lakeside switching station (Bellevue) have not been upgraded since the 1960s. Since then, the Eastside's population has grown from approximately 50,000 to nearly 400,000 people. Growth is expected to continue.

As part of the mandatory North American Electric Reliability Corporation ("NERC") Compliance Enforcement Program[2], PSE performs an annual comprehensive reliability assessment[3] to determine if any potential adverse impacts to the reliability of delivery of electricity exist on the PSE transmission system. Studies performed in 2013 and 2015 demonstrated PSE could not meet federal reliability requirements by the winter of 2017/18 and the summer of 2018 without the addition of 230 kV/115 kV transformer capacity in the Eastside area.

To respond to the deficiencies identified in the transmission planning studies, PSE launched the Energize Eastside project in December 2013. After an analysis of alternatives, PSE ultimately proceeded with a project that entails installing approximately 16 miles of new 230 kV transmission line between the existing Sammamish and Talbot Hill substations using the same utility corridor where 115 kV lines now exist, the construction of a new 230 kV/115 kV electric substation site (Richards Creek substation) and continued aggressive conservation. The Richards Creek substation will be located adjacent to the Lakeside switching station, from which most of the Eastside's 115 kV power is routed to customers.

System Reliability Planning

The performance requirements of any integrated transmission system are heavily regulated at both the federal and regional levels. PSE's regulators include the Federal Energy Regulatory Commission ("FERC"), the North American Electric Reliability Corporation ("NERC") and the Western Electricity Coordinating Council ("WECC"). As certified by FERC, NERC is the regulatory authority that develops and enforces reliability standards. NERC has delegated the task of monitoring and enforcing the federal reliability standards to WECC, a regional entity that has authority over the Western region, including PSE. Like all system operators, it is PSE's responsibility to plan and operate the electric system to ensure reliable power delivery to customers.

[1] For the purpose of this project, the Eastside is defined as the area between Renton and Redmond, bounded by Lake Washington to the west and Lake Sammamish to the east.

[2] NERC Reliability Standards for the Bulk Electric Systems of North America

[3] PSE Planning Studies and Assessment TPL-001 to TPL-004 and TPL-001-4 Compliance Reports

The NERC standards mandate that certain forecasts and studies be completed to determine if the system has sufficient capability to meet expected loads now and in the future. When completing transmission planning studies, contingencies are simulated to determine if the electric system meets the NERC mandatory performance requirements[4] for a given set of forecasted demand levels, generation configurations and levels, and multiple system component outages. This conservative planning methodology, which has been developed over decades, is implemented to prevent large-scale, cascading, transmission system blackouts, like those that have occurred in the recent past (e.g., the 2003 Northeast blackout that affected 55 million people in the Northeast and Midwest regions of the United States and into Canada).

Eastside Planning Studies Results

As stated above, PSE transmission planning studies demonstrated that, under certain contingencies and scenarios, the delivery system on the Eastside cannot continue to meet the mandatory reliability requirements without significant infrastructure upgrades or by dropping load (i.e., turning customers' power off). The Needs Assessment reports, published in 2013 and updated in 2015, which PSE performed pursuant to the mandatory federal transmission planning standards, identified four major areas of concern:

1. Overload of PSE facilities in the Eastside area. Specifically, studies identified potential overloading of transformers at Sammamish and Talbot Hill substations. Transformers are a key piece of electrical equipment that allows the electricity to get from its generation source (*e.g.,* wind farm, hydroelectric, etc.) to customers' homes and businesses. Additionally, several 115 kV transmission lines routing power around the Eastside area are also at risk of overloading under certain conditions.
2. Small margin of error to manage risks from inherent load forecast uncertainties. PSE's planning studies rely in large part on load forecast data. Imbedded in PSE's load forecasts are several factors that include elements of risk, including conservation, weather, and block loads.
    - Conservation: To date, PSE customers have achieved 100 percent of the company's conservation goals, which are very aggressive according to industry experts. If 100 percent of conservation goals are not achieved, then the transmission system capacity would be surpassed sooner than expected.
    - Weather: PSE's load forecast assumes "every other year" cold weather, which is not as conservative as most other utilities that study system performance during the coldest and hottest weather in five or ten years. If the region experiences weather extremes outside of those used in the planning studies, electricity demand would surpass the transmission system capacity sooner than expected.
    - Block loads: These include large development projects that add significant load to the system. If block load growth increases more than anticipated, demand for electricity would surpass the transmission capacity sooner than expected.
3. Increased use and expansion of Corrective Action Plans (CAPs) to keep the system compliant.

    CAPs are a series of steps used to prevent system overloads or loss of customers' power. They are a short-term fix to alleviate potential violations that could put the local area or the entire Western grid at risk. They protect against large-scale, cascading power outages; however, they can put large numbers of customers at increased risk of power outages. For example, to prevent winter overloads

[4] The transmission planning standards that were in effect in 2012-2013 were: TPL-001-3, TPL-002-0b 2nd Rev (TPL-002-2b),TPL-003-0b 2nd Rev (TPL-003-2b), and TPL-004-2. TPL-001-3, TPL-002-2b, TPL-003-2b, and TPL-004-2 are being retired as they are replaced in their entirety by TPL-001-4. Enforcement started 1/1/15. http://www.nerc.com/pa/Stand/ReliabilityStandards/TPL-001-4.pdf

on the Talbot Hill transformer banks, PSE currently is using CAPs, which increases outage risk to customers. As growth continues, additional CAPs will be required.

4. Impacts to regional grid identified by ColumbiaGrid. Because the electric system is interconnected for the benefit of all, it is a federal requirement to study all electric transmission projects to ensure there are no adverse impacts to the reliability or operating characteristics of PSE's or any surrounding utilities' electric systems. ColumbiaGrid, the regional planning entity, produces a Biennial Transmission Expansion Plan that addresses system needs in the Pacific Northwest, including the PSE system. PSE has to be mindful of those plans and understand the identified risks.

PSE's 2015 Supplemental Needs Assessment Report reconfirmed the earlier 2013 Needs Assessment Report by stating the following:

> *By winter of 2017-18, there is a transmission capacity deficiency on the Eastside that impacts PSE customers and communities in and around Kirkland, Redmond, Bellevue, Issaquah, Newcastle, and Renton along with Clyde Hill, Medina, and Mercer Island.* ***By winter of 2019-20, at an Eastside load level of approximately 706 MW, additional CAPs are required that will put approximately 63,200 Eastside customers at risk of outages.***
>
> *The 2015 Needs Assessment also confirmed that by summer of 2018, there will be a transmission capacity deficiency on the Eastside that impacts PSE customers and communities in and around Kirkland, Redmond, Renton, Bellevue, Issaquah, and Newcastle along with Clyde Hill, Medina, and Mercer Island.* ***By summer of 2018, CAPs will be required to manage overloads under certain Category C contingencies and the use of these CAPs will place approximately 68,800 customers at risk and could require 74 MW of load shedding, affecting approximately 10,900 customers.***

If certain scenarios were to have occurred, PSE may have implemented additional CAPs that could resulted in PSE intentionally turning the power off to tens of thousands of customers in order to help prevent widespread outages to additional tens of thousands of customers in the Eastside area and beyond.

Solution to Meet the Need

A third party assessment[5] commissioned by the City of Bellevue confirmed PSE's identification of this transmission capacity deficiency in the Eastside area. Any solution to solve this deficiency must meet all NERC performance criteria, address all relevant PSE equipment overloads, and continue to meet the performance criteria for **at least** 10 years after construction. The studies for the needs assessment shows that the solution needs to be in-service by winter 2017-18, to meet the NERC TPL-001-4 performance requirements.

After extensive study and evaluating dozens of alternatives[6], PSE determined that the most effective solution that meets all criteria and complies with the federal performance requirements is the addition of a 230 kV/115 kV transformer in the center of the Eastside load area connected by 230 kV transmission lines from both the Sammamish and Talbot Hill substations, as well as continued aggressive conservation.

[5] Utilities Systems Efficiencies, Independent Technical Analysis of Energize Eastside for the City of Bellevue, April 28, 2015.

[6] PSE Eastside Transmission Solutions Report, King County Area, October 2013; Updated 2014 & Supplemental Eastside Solutions Study Report, Transmission System, King County, May 2015.

Project Need

PSE disagrees with unsubstantiated commenter statements related to project need. Energize Eastside is needed to address area growth and to meet federal reliability requirements during peak demand for electricity. This has been confirmed by independent experts retained by Bellevue and as part of the EIS process. The last major upgrade to the backbone of the Eastside's electric grid was more than 50 years ago. Since then, our population has grown eight-fold, and the demands residents and businesses place on the system have increased. Four years ago, PSE's studies– again, confirmed by independent experts– revealed our transmission grid is strained today under peak conditions, just at the time when our customers need reliable power the most.

As stated above, the city of Bellevue retained - at the request of members of the public - an independent expert, Utility System Efficiencies, Inc. (USE) to perform an independent study of project need. Members of the public helped the city determine the scope of the study. USE modeled scenarios in power flow cases and verified that PSE followed industry practice in forecasting demand load.

Based on key questions posed by the public, the April 28, 2015, USE study concluded:

- *Is there a need for this project to address growth in Bellevue?* **YES**.
- *Is the EE project needed to address the reliability of the electric grid on the Eastside?* **YES**.
- *If the load growth rate was reduced, would the project still be needed?* **YES**.
- *If generation was increased in the Puget Sound area, would the project still be needed?* **YES**.
- *Is there a need for the project to address regional flows, with imports/exports to Canada (ColumbiaGrid)?* **Modeling zero flow to Canada, the project is still necessary to address local need**.

In addition to the review by Bellevue's consultant, the Partner Cities, retained their own independent EIS subcontractor, Stantec, to review and opine on the PSE needs assessment. Stantec stated:

"Based on my expertise, I found that the PSE needs assessment was overall very thorough and applied methods considered to be the industry standard for planning of this nature. Based on the information that the needs assessment contains, I concur with the conclusion that there is a transmission capacity deficiency in PSE's system on the Eastside that requires attention in the near future." - Review Memo by Stantec Consulting Services Inc., July 31, 2015.

PSE is a heavily regulated investor-owned utility whose actions are carefully monitored and reviewed by the Washington Utilities and Transportation Commission (UTC). PSE invests in capital infrastructure based on need and consequence – i.e., what happens if the infrastructure is not built. Our rate of return is regulated by the state, not PSE. The company's rate of return on any infrastructure investment is never guaranteed, contrary to what has been stated by many commenters, and may change with every rate case.

Reliable power is critical to the community's health, safety and vitality. The alternative of doing nothing or delaying the project could put the Eastside at an economic disadvantage and could have local economic impacts, as indicated by an independent study by Nexant.[7]

It is PSE's responsibility to provide safe, reliable power to all of its customers. Energize Eastside is the most reliable and cost-effective solution for doing so and the need has been confirmed.

[7] http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/pse_energize_eastside_outage_cost_study_-_final__10.30.2015_.pdf

Pipeline Safety

When evaluating the replacement of the existing 115 kV transmission lines with 230 kV lines in the utility corridor, one of the key factors studied was the impact (if any) of the colocation of the transmission lines with the petroleum pipelines operated by Olympic Pipeline Company (Olympic). Customer safety is PSE's first priority, and we have a long history of working closely with Olympic to ensure continued protection and safe operations of existing pipelines and high voltage transmission lines that have shared the corridor for decades.

PSE proactively engaged a technical consultant, DNV GL, to study and provide recommendations on collocating Energize Eastside with Olympic's pipelines. This study was one of the first conducted by a transmission line operator to assess the potential AC interaction between the transmission lines and the pipelines[8]. Based on DNV GL's recommendations, in order to minimize AC interaction with the pipeline(s), PSE has designed the project to have at least a 13-foot separation distance between the pipeline and the pole grounding system. This exceeds both federal regulations and Olympic's requirements for separation. Additionally, using the existing corridor and mitigating impacts by operating both of the replacement lines at 230 kV, is expected to reduce the level of potential interaction to less than the modeled conditions of the existing 115 kV system.

PSE continues to work with Olympic to refine the design of the transmission line in accordance with industry and engineering best practices for the safe construction and operation of both facilities. This effort includes using advanced technologies like ground-penetrating radar to survey pipeline locations. During construction, PSE and Olympic follow prescribed notification and inspection procedures when working in the corridor. Prior to excavation work in the corridor, PSE and Olympic meet onsite to inspect the area and confirm the location of the pipeline(s). Additionally, specialized equipment is typically used for the excavations required for pole installation. Vacuum trucks are commonly used to excavate the holes to depths greater than the pipelines.

The Partner Cities' EIS team also analyzed pipeline safety, which is documented in the Final EIS in Chapter 4.9 Environmental Health – Pipeline Safety and in Section 6.18 Summary of Response to Comments on Public Services. The Final EIS concluded that:

> "Even with worst-case assumptions related to the increased risk during operation and construction, the likelihood of a pipeline release and fire would remain low, and no substantial increase in risk compared to the existing conditions was identified. It is expected that with the implementation of additional mitigation measures, any increase in risks within the corridor can be fully mitigated. As a result, no significant unavoidable adverse impacts have been identified." (page 1-31)

As stated previously, PSE's existing transmission lines and Olympic's pipelines have shared a utility corridor for more than 40 years. During that time, PSE has safely replaced poles within the shared utility corridor. In 2007 and 2008, PSE worked with Olympic to replace more than 130 poles and reframe more than 200 poles in this corridor and others. As recently as 2016, we safely replaced two poles adjacent to the pipelines in Newcastle. PSE understands the community's concerns, and we will continue to work with Olympic Pipeline to implement safe construction practices and operations.

[8] This study was recently presented by DNV-GL at the 2018 National Association of Corrosion Engineers (NACE) national conference.

Using the existing transmission corridor limits impacts

By using the existing corridor, Energize Eastside affects the fewest number of trees and avoids the construction of new utility corridors. The existing corridor was first developed during the late 1920s and early 1930s. Neighborhoods have since built up around it and PSE has managed and maintained (i.e., topped and/or trimmed) the trees underneath the existing transmission lines to prevent them from causing safety and reliability issues.

The Partner Cities' Final EIS confirms that "PSE's policy is to restore vegetation other than trees within transmission corridors to as like or better condition. Outside of the Managed Right-of-Way, tree replacement is agreed upon with the property owner (in some cases the owner may prefer tree removal without replacement). Tree replacement would also comply with local code requirements, as described above in Section 3.4.1 of the Phase 2 Draft EIS." (Section 4.4.4.1, page 4.4-4).

Furthermore, the EIS process considered a worst-case scenario for tree removal, and the maximum number of trees that could potentially be removed for the entire project (from Redmond to Renton) is about 3,600 trees. However, this overestimates the number of trees that will be removed, because PSE is working with property owners to better assess and reduce the number of trees affected. We know our customers value trees. PSE will meet the tree replacement mitigation requirements and work with property owners to replace trees. Our goal is that, when the project is complete, there will be more trees, not fewer. We're working with city staff, and with property owners, to ensure that we accomplish this.

Energy Facility Site Evaluation Council (EFSEC)

Commenters have questioned why PSE has not applied to EFSEC as a way to seek approval for the Energize Eastside project. Transmission line projects are not commonly reviewed through the EFSEC process. Additionally, it is decision of the utility as to whether they seek review under EFSEC. PSE understands and is fully aware of the various EFSEC processes. However, at this time, PSE has determined that working directly with the various jurisdictions allows for the most collaborative approach.

Other alternatives were studied; Energize Eastside is the right solution

The Partner Cities' EIS Team and PSE, as well as other experts, have studied other alternatives, including conservation/energy efficiency, new generation, and batteries. These alternatives were eventually eliminated because they did not solve the problem, did not meet federal planning standards, would be difficult to permit, or rely on voluntary participation.

We understand customers want us to consider innovative solutions like batteries. PSE and energy storage industry experts determined batteries are not a cost-effective or practicable solution for the Eastside's transmission capacity deficiency. This technology has not been used for the type and scale of problem facing the Eastside.

Energize Eastside solves the Eastside's transmission capacity deficiency. The project's combination of continued aggressive electric conservation, a new substation, and upgraded transmission lines is the most reliable and cost-effective solution. To review the various studies on alternatives, visit the Partner Cities' EIS Library www.EnergizeEastsideEIS.org/library.html.

Electro-magnetic Fields (EMF)

Electro-magnetic fields were addressed during the EIS process. The FEIS states "There are no known health effects from power frequency EMF. For all proposed segments and options, the calculated magnetic field levels would be well below reference guidelines. Therefore, under PSE's Proposed Alignment, impacts would be less-than-significant." The FEIS also states that: "Operation of the proposed transmission lines would result in a decrease of magnetic field levels for PSE's Proposed Alignment relative to the No Action Alternative" (*i.e.,* current conditions). FEIS at page 4.8-9.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
1	1/1	Anderson, Daren	9424 117th Ave NE, Kirkland WA 98033	14-Nov-17	What if multiple batteries are interconnected at 12.5 kV at multiple locations	Please refer to the 2015 Eastside System Energy Storage and Alternatives Assessment and subsequent 2018 Report Update by Strategen Consulting.
2	1/3	Warme, Jeanne	13608 NE 36th Pl. 98005	14-Nov-17	My primary concerns are in regards to transparency, aesthetics and safety. 1. Transparency: Is this project *really* needed? Is it truly the best way to solve the problem and are local needs truly being considered? I've heard PSE's speil and looked at their website, but NONE of those questions have been honestly addressed.	Yes, the project is really needed. PSE looked at many solutions (Solution Study 2014 and Supplemental Solutions Study 2015) and local needs are being considered. Five studies have affirmed the need for this project. Two of those studies were conducted by independent experts for the City of Bellevue and the Environmental Impact Statement (EIS) team. Independent consultants hired by the City of Bellevue and our professional transmission planners verified the need for the Energize Eastside Project. Please see the attached Comment Response Summary and EIS for additional information.
3	2/3	Warme, Jeanne	13609 NE 36th Pl. 98005	14-Nov-17	My primary concerns are in regards to transparency, aesthetics and safety. 2. Aesthetics: What PSE says they will deliver (less poles, better use of space, healthier trees) and what their own images project are VASTLY different. I hope you heard the collective GASPS in the room when those images were shown. We live in Bellevue because it is a beautiful place and not an industrial site. Sure, if this was ONLY or BEST way, we would accept it - but it is not and it will destroy so much of what makes Bellevue beautiful.	Comment noted. Please see the attached Comment Response Summary and EIS section addressing aesthetic impacts for additional information. PSE continues working with the partner cities to identify ways to avoid, reduce and mitigate for aesthetic impacts.
4	3/3	Warme, Jeanne	13610 NE 36th Pl. 98005	14-Nov-17	My primary concerns are in regards to transparency, aesthetics and safety. 1. Safety: I have yet to see a truly independent assessment of the safety of the pipeline co-existing with the existing powerlines - nevermind safety voltage AND construction. And interestingly in the 10 years we've owned our home, only once has the pipeline been inspected for safety and that was within the past 6 months. This is a HUGE concern to me.	Please see sections 4.9 and 5.9 of the FEIS for information related to this comment. The Olympic pipeline and the two existing 115kV transmission lines have safely shared the same corridor for decades. PSE and Olympic have a long history of working together and that continues with Energize Eastside. According to page 4.9-7 of the FEIS, Olympic Pipeline patrols the pipeline corridor on a weekly basis. Additional information is also provided in the same section of the FEIS.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
5	1/10	Alavi, Barry		8-Feb-18	My name is Barry Alavi, I am a Professional Engineer (PE) and Project Management Professional (PMP). I was an adjust professor on risk management at University of Washington for more than 5 years. I have more than 35 years of experience in building large infrastructure projects for the energy, aviation and transportation industries globally, USA and Canada. I am also father of Darian Alavi who attends the Chestnut Hill Academy (CHA) located at 13633 SE 26th St in Bellevue, Washington. CHA is within 150' of the fence line of the existing PSE substation and will be proximate to the future proposed sub-station to the south of the CHA campus. My wife and I are concerned about the expansion of the substation, the increase in power lines voltages (115KVa to 230KVa) and the risks and exposures associated with such an expansion to the public, CHA staff and students. The Olympic pipeline (jet fuel, diesel and gasoline, owned and operated by BP, British Petroleum) 16" pipeline lateral shares a right of way with PSE power lines. There are several issues that I have brought up in various meetings with PSE and BP. The issues are : **BP Pipeline:** 1) What are the impacts of the voltage increase on the existing Cathodic protection system? AC currents leaking into the pipeline from power lines above 15 Volts causes surface corrosion (that leads to eventual crack and leakage), what measure are being taken to ensure that limit is not exceeded? What are the current measurements?	We understand your concerns and have undertaken extensive analysis to ensure the continued safe collocation of the BP pipeline with PSE's facilities. The route ultimately pursued by PSE minimizes to the extent feasible the transmission line's interaction with the pipeline. Please see Section 3.9 of the Phase 2 Draft EIS and Section 4.9 of the FEIS for information. Please also see the DNV-GL study which directly addresses the potential for interactions between the utility facilities. The Olympic pipeline and the two existing 115kV transmission lines have safely shared the same corridor for decades. PSE and Olympic have a long history of working together and that continues with Energize Eastside. PSE does not have specific operational information on, nor can it make representations regarding Olympic's (BP's) pipeline system.
6	2/10	Alavi, Barry		8-Feb-18	**BP Pipeline:** 2) The pipeline pressure fluctuations or cyclic pressure swings are a concern, what is BP doing to ensure a uniform operating pressure? The fluctuations contribute to micro cracks that could lead to a pipeline leak or explosion.	See section 4.9 of the FEIS for information related to Olympic's operations. As stated on page 4.9-25 of the FEIS, "Because the Energize Eastside project does not affect pipeline pressure and flow rates, or other operating parameters of the pipeline, the potential characteristics of a spill or fire would be the same regardless if it occurred under the No Action Alternative or Alternative 1." Regarding BP operating pressure management, PSE cannot speak with specificity or make representations regarding BP's operations.
7	3/10	Alavi, Barry		8-Feb-18	**BP Pipeline:** 3) What measures are PSE and BP taking to minimize impact to the pipeline during construction? This relates to installation of tall power poles proximate to the buried pipelines. Induced vibration due to construction activity is a concern. The pipe in a 1955 vintage steel pipe coated with tar and asbestos,	See section 5.9 of the FEIS for information. The design of the Energize Eastside project, including the pole locations, is based on detailed surveys of the pipeline's existing location along the project route. Using this location information, the pole locations were selected to avoid impacts to the pipeline during construction. PSE is working closely with OPL on implementing construction procedures to protect the pipeline and inspection protocols and reporting to verify that all procedures are followed and to confirm that the pipeline was not impacted during construction of the Energize Eastside project. A third party observer will also be onsite during construction to ensure implementation of all BMPs related to construction in proximity to the pipeline.
8	4/10	Alavi, Barry		8-Feb-18	**BP Pipeline:** 4) The new sub-station south of CHA will have a permanent access road over the pipeline, what are measures taken during Design and Construction to minimize impact on pipeline ? What outages are scheduled for the pipeline during construction?	See Section 5.9 of the FEIS for information. The design of the Energize Eastside project, including the pole locations, is based on detailed surveys of the pipeline's existing location along the project route. Using this location information, the pole locations were selected to avoid impacts to the pipeline during construction. PSE is working closely with OPL on implementing construction procedures to protect the pipeline and inspection protocols and reporting to verify that all procedures are followed and to confirm that the pipeline was not impacted during construction of the Energize Eastside project. PSE does not have specific operational information on Olympic's pipeline system.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
9	5/10	Alavi, Barry		8-Feb-18	**BP Pipeline:** 5) On SE 26th there is a valve station that is above ground , BP shall install bollards in front of the pipe and valve assembly to prevent vehicle intrusion and accidents that can occur if a car veered off the main road onto the assembly. The design shall be submitted to CHA for review and approval.	Comment noted; however, PSE does not operate BP's facilities.
10	6/10	Alavi, Barry		8-Feb-18	**PSE** 1) There are several poles that are within 30 feet of CHA fence line on the west property line , these will create excessive EMF, would PSE consider under-grounding these lines (buried power lines) ?	The Energize Eastside project will not create excessive EMF. Please see Section 4.8 of the FEIS for information. See Section 2.2.2 of the Phase 2 Draft EIS for information related to undergrounding transmission lines.
11	7/10	Alavi, Barry		8-Feb-18	**PSE** 2) The plans show only the 16" pipeline at the new sub station, but there are two pipelines, Can PSE show the location of the 20" buried pipeline ?	At the new substation location (Richards Creek), only the 16" pipeline is located on site. The 20" pipeline is not located on the Richards Creek substation property. The 20" pipeline departs from the 16" pipeline at Coal Creek Parkway, and then follows Coal Creek Parkway, Factoria Boulevard, and SE 26th Street, until it rejoins the 16" pipeline at the gate station located to the north of the Lakeside substation.
12	8/10	Alavi, Barry		8-Feb-18	**PSE** 3) What are the projected EMF levels after upgrade to 230kv ?	Section 4.8 of the FEIS addresses anticipated EMF levels.
13	9/10	Alavi, Barry		8-Feb-18	**PSE** 4) What type of foundations are being installed for the new poles , how is the induced vibration onto the pipeline is mitigated ?	The new poles will be directly embedded into the ground or installed on a foundation. The type of foundation could vary based on location in the corridor but will likely be a drilled pier or pile type foundation. See section 5.9 of the FEIS for information. Additionally, the design of the Energize Eastside project, including the pole locations, is based on detailed surveys of the pipeline's existing location along the project route. Using this location information, the pole locations were selected to avoid impacts to the pipeline during construction. PSE is working closely with OPL on implementing construction procedures to protect the pipeline and inspection protocols and reporting to verify that all procedures are followed and to confirm that the pipeline was not impacted during construction of the Energize Eastside project.
14	10/10	Alavi, Barry		8-Feb-18	**PSE** 5) What are the existing AC levels of voltage at the pipeline ? Is the existing cathodic protection adequate for the future increase voltage ? We have not received any responses from BP on the pipeline issues as they advised that information is company confidential. As a reference I would like to note that due to blast zone concerns in state of California, the state does not allow any public facility within 1500 feet of an operating pipeline (https://www.cde.ca.gov/ls/fa/sf/title5regs.asp). Although the probability of a pipeline explosion is low, the consequences of the event to the CHA (over 200 students and staff which is located within a few hundred feet of the pipeline and substations) is not acceptable (not tolerable). We believe the project is not necessary and will create substantial impacts to the environment and the public. Please contact me if you like to have a	Please see Section 4.9 of the FEIS for information related to AC voltage levels. Please see page 4.9-12 for information from Olympic Pipeline related to the cathodic protection system. The upgrade of these transmission lines will be designed and built in accordance with current engineering standards and in compliance with federal, state, and local laws and codes. Please see the Comment Response Summary for additional information related to project need.

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					conversation on these issues. Thank you!	
15	1/3	Johnson, Larry	8505 129th Ave. SE, Newcastle, WA 98056	5-Feb-18	**EMAIL: CSEE submission re PSE IRP, Docket UE-160918** **1. <u>"1,500 MW to Canada"</u>** **Energize Eastside (EE) is an old, dusted-off project** whose primary intent was to meet a perceived need in 2003 for delivery of more power to Canada, in an area technically called the Northern Intertie at the Canadian border. BPA led this charge, concerned that up to 1,500 MW of power might be needed to send to Canada under a treaty with the United States. 1,500 MW is a lot of power, about what the city of Seattle consumes daily under normal conditions. This 2003-inaugurated project was called Snohomish-Lakeside-Talbot. "Energize Eastside" is still called Snohomish-Lakeside-Talbot by ColumbiaGrid, the regional entity that PSE belongs to. Yet without disclosing the historical origins of EE, PSE dusted it off in 2014 and claimed it was a "new" project for local load only. Nevertheless, PSE kept in EE the supposed need to supply Canada with 1,500 MW from the old project (1,500 MW that can never be delivered, anyway — see Section 2 below), and used that as a factor in PSE-sponsored load flow studies to justify EE. USE, an independent consultant hired by the City of Bellevue, assumed PSE's 1,500 MW assumption was correct and erroneously adopted it without question. Without that 1,500 MW factored into the computer simulation for an extreme cold day — an event that would stress system reliability — we now know there is no need for EE. The Lauckhart-Schiffman load flow studies prove that, and these are the only load flow studies ever done that are totally transparent. PSE has steadfastly refused to fully disclose the key data it used in its studies, though we know it had to have 1 relied on these bogus 1,500 MW to make its studies come out the way they wanted. PSE claims there is a "firm commitment" for PSE to deliver those 1,500 MW, though BPA in a reply to my FOIA request states that no such firm commitment exists.3 And clearly, neither PSE nor its customers are required to pay for local transmission sufficient to deliver 1,500 MW to Canada.	Operationally, there are always power flows across the northern intertie. Typically, the power flows from north to south during the summer and south to north in the winter. However, as stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "The Optional Technical Analysis examined this issue by reducing the Northern Intertie flow to zero (no transfers to Canada). Although this scenario is not actually possible due to extant treaties, it was modeled to provide data on the drivers for the EE project, to examine if regional requirements might be driving the need. The results showed that in winter 2017/18, even with the Northern Intertie adjusted to zero flow, the Talbot Hill 230/115 kV transformer #2 would still be overloaded by several contingencies (several different outage scenarios). The projected overloads indicate a project need at the local level to meet reliability regulations." EIS Phase 2, Chapter 1 - Based on federally mandated planning standards, PSE's analysis found that the existing transmission system could place Eastside customers and/or the regional power grid at risk of power outages or system damage during peak power events that typically occur in cold or hot weather as early as the summer of 2018 (PSE, 2017). PSE's analysis concluded that the most effective solution was to add a 230-to-115 kV transformer within the center of the Eastside to relieve stress on the existing 230-to-115 kV transformers that currently supply the area. This would need to be fed by new 230 kV transmission lines from the north and south. By having lines from two different directions, a substation can continue to be supplied even if one line goes down.
16	2/3	Johnson, Larry	8505 129th Ave. SE, Newcastle, WA 98056	5-Feb-18	**EMAIL: CSEE submission re PSE IRP, Docket UE-160918** **2. <u>Voltage collapse</u>** **ANY such 1,500 MW "commitment" is impossible to meet, anyway.** Why? Because there would not be transmission capability over the Cascades to deliver the needed amount of power to meet Puget Sound Area peak load and deliver this 1,500 MW to Canada. If PSE ever were to try to send 1,500 MW to Canada, or even significantly lesser amounts, there would be a **voltage collapse as a result.** To prevent appliances and motors from being	The commenter misinterprets voltage collapse. Voltage collapse and low-voltages are not one and the same. PSE has already seen flows more than 1,500 MW on the lines during the months of July and December that constitute peak summer and winter load periods. Operationally, there are always power flows across the Northern Intertie. Typically, the power flows from north to south during the summer and south to north in the winter. However, as stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "The Optional Technical Analysis examined this issue by reducing the Northern Intertie flow to zero (no transfers to Canada). Although this scenario is not actually possible due to extant treaties, it was modeled

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					fried due to low voltages, there would have to be a massive power shutdown in Western Washington in such an event. In other words, a blackout. PSE's load flow studies must surely have shown them that, and that is almost certainly the reason why they won't show their homework.	to provide data on the drivers for the EE project, to examine if regional requirements might be driving the need. The results showed that in winter 2017/18, even with the Northern Intertie adjusted to zero flow, the Talbot Hill 230/115 kV transformer #2 would still be overloaded by several contingencies (several different outage scenarios). Again, the projected overloads indicate a project need at the local level to meet reliability regulations." Further discussion related to flows over the Northern Intertie are not warranted.
17	3/3	Johnson, Larry	8505 129th Ave. SE, Newcastle, WA 98056	18-Jan-18	**EMAIL: CSEE submission re PSE IRP, Docket UE-160918** **3. <u>No Eastside "backbone", but rather a 115 kV network that needs no upgrading</u>** **PSE's PR about the "backbone" of the grid on the Eastside having not been upgraded since the 1960s is not true.** Starting as early as 1992, PSE considered upgrading the Lakeside transformer and feeding it with 230kV lines to replace the existing 115kV lines as contemplated by EE. Instead, over the years PSE has built a number of new 115kV lines to meet energy demand increases in the 1990s and into the early 2000s. **What we have on the Eastside is a 115kV network, not a single backbone.** See the attached graphic prepared by former Puget Power VP for Power Planning, Richard Lauckhart, that shows this 115kV network. This system needs no further "upgrading."	The PSE's Needs Assessment (2013) and Supplemental Needs Assessment (2015) have shown that the need is the 230 kV/115 kV transmission capacity, which supplies the 115 kV network. The need is not on the 115 kV network. This result is based on in-depth analysis by qualified experts, including third party experts. Utilities are required to rigorously plan the transmission system. To do this, PSE plans its transmission system to meet mandatory North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) reliability performance requirements. Utilities (including PSE) must ensure the system will maintain reliable service to customers under a wide range of scenarios of normal and not-so-normal conditions. These conditions include when the weather is extremely hot, extremely cold, or when components of the system are out of service (i.e., existing powerline down for repair, equipment failure, or other unexpected outage). These federal regulations are not optional; they are required.
18	1/3	Johnson, Larry	8505 129th Ave. SE, Newcastle, WA 98056	18-Jan-18	**EMAIL: CSEE submission re PSE IRP, Docket UE-160918** **A. PSE's IRP clings to outmoded forms of energy production and distribution.** PSE stubbornly ignores your admonition to produce an IRP consistent with new technologies, clean energy, and a holistic approach to energy. It has consistently resisted adequate measures to reduce the carbon emissions and toxic chemicals spewing out of the Colstrip plant in Montana. Further, PSE compounds its backward-looking vision by promoting Energize Eastside ("EE"), a $300 million dinosaur of a transmission project that would replace older wooden poles with even bigger steel towers to transmit four times the existing power — towers placed dangerously close to two aging pipelines pumping jet fuel under pressure through the Olympic Pipelines from Bellingham to SeaTac and beyond. EE is an environmental and public safety disaster waiting to happen. Yet PSE fights all public opposition tooth and nail because this project was incentivized by a nearly 10% state-guaranteed return on infrastructure investment. Maximizing corporate profit, promoted by our laws, drives this project. To date PSE has reportedly spent up to $50 million in PR and legal fees to sell EE to the public with phony "load flow studies" (hiding key data from the public) and an onslaught of false advertising. Consistent with such practices, P 1 SE plays the same hide-the ball tactics in its efforts to sell a half-baked IRP to the UTC.	This comment contains a series of incorrect statements, and offers opinion. No question is contained regarding the CUP analysis. The application before Bellevue is a CUP; a different agency has jurisdiction over the IRP, which is not a permit application. It is not clear what question is being asked. It should be noted that the statements made are incorrect.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
19	2/3	Johnson, Larry	8505 129th Ave. SE, Newcastle, WA 98056	18-Jan-18	**EMAIL: CSEE submission re PSE IRP, Docket UE-160918** **B. Energize Eastside is not needed and thus not a "resource" PSE can legitimately designate in its IRP.** Richard Lauckhart is a former Vice President for Power Planning for what was then Puget Power. He has retained an abiding interest in assuring that the ratepayers he served for so many years not be called upon to suffer and pay for a needless, dangerous, and environment tally harmful project. On January 8, 2018, Mr. Lauckhart submitted to you his detailed analyses about PSE's false project assumptions and rigged load flow studies undertaken to sell EE to city councils and the public. Mr. Lauckhart's white paper is supported by a host of detailed technical facts. CSEE endorses Mr. Lauckhart's analyses and conclusions which are attached to the email transmitting this letter. At a minimum, PSE needs to explain to the UTC and fully document much of the sought-after information it has withheld from CSEE, CENSE and Mr. Lauckhart, even after FERC told PSE that Mr. Lauckhart was CEII-cleared and deserved to have the complete data from the PSE-sponsored load flow studies. Among other things, the UTC should order PSE that the load flow data that Mr. Lauckhart, CSEE, and CENSE have been requesting for over the past three years be given to him. Additionally, another authoritative voice spoke out recently against EE for reasons such as those given by Mr, Lauckhart. Mr. Steve Funk, a former Chairman of the Bellevue Planning Commission, last week wrote in a Bellevue Reporter op-ed: "As a commissioner I thought of the city as a machine in which every part works together for the benefit of neighborhoods and the city as a whole. Energize Eastside appears to place burdens on residents and neighborhoods to facilitate rapid development in downtown Bellevue and the new Spring District. However, the premise of the project has been thrown into doubt by new technology and declining consumption of electricity. "PSE is repeating the same mistake Seattle City Light made in recent years. Both utilities anticipated increasing demand for electricity due to population growth. However, demand has been falling in Seattle and the Eastside despite the growing population and economy. These trends are occurring across the country due to climate change, conservation, renewable energy, and more efficient lighting, computers and appliances. PSE's revenues have been declining for years, providing the company with an economic incentive to promote a transmission line. The $300 million project will increase PSE's revenues and utility bills for customers for decades. "Other cities are installing safer, less expensive alternatives, such as large batteries manufactured by Tesla and other companies. Batteries can be installed in less than three months and provide better reliability than a new transmission line for a fraction of the cost. Batteries also reduce carbon emissions by storing cheap solar and wind energy during periods of low need. When demand peaks around dinner time, electricity can be withdrawn from the batteries instead of burning fossil fuels in a coal or gas-	These comments are related to PSE's Integrated Resource Plan (IRP) and not the CUP application. A different agency has jurisdiction over the IRP, which is not a permit application.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					fired plant. Additional batteries can be installed to exactly match our need instead of building an expensive transmission line with more capacity than we may ever need.	
20	3/3	Johnson, Larry	8505 129th Ave. SE, Newcastle, WA 98056	18-Jan-18	**EMAIL: CSEE submission re PSE IRP, Docket UE-160918** **C. The UTC needs to use the woefully limited power it has to signal to PSE and its investor owners that Energize Eastside is imprudent and unworthy of reimbursement.** The King County Bar Association's publication, Bar Bulletin, published my article, "The Toothless Washington Utilities and Transportation Commission," in March 2017.3 I arguein the article that the UTC is virtually unique among all other such state utility commissions in not having the power to stop an ill-considered project before it is built. The UTC can only deny reimbursement for a project after such a project is built, after all the harm has been done. Not surprisingly, the UTC has never exercised even this somewhat futile option, leaving open the question of what, beyond rates, the UTC can effectively regulate. Nothing in Washington law prevents the UTC from issuing a non-binding written opinion stating that building Energize Eastside would be imprudent, based on the existing evidence and subject to a responsive rebuttal from PSE. Your opinion could be provisional and subject to change if the evidence warranted it. But, with due process fully preserved for PSE, why does the UTC have to remain silent now? Not only would your provisional opinion be a fair and responsible thing to do to protect the public, but it would also serve as a fair warning to PSE's foreign investor owners. PSE's continuing passive-aggressive approach to formulating a proper IRP presents an opportunity for the UTC to act proactively not only on Colstrip, but on Energize Eastside as well. Further, if in the extreme case PSE chooses to continue to ignore and game the UTC and the public regarding its IRP and boondoggle projects, then I submit the UTC has the inherent power to disenfranchise PSE and invite another entity to take its place. PSE was not given a permanent and perpetual monopoly, unaccountable to those who granted that monopoly.	Comments and opinions noted, however, no questions are posed.
21	1/1	Aramburu, Rick	Aramburu & Eustis, LLP 720 Third Avenue, SUITE 2000 Seattle, WA 98104	17-Jan-18	Read Attachment: **2018-1-17 CENSE re PSE Segmentation.pdf**	PSE's CUP application is consistent with State and City regulations. To date, the major permit applications have been submitted for the southern portion of the project.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
22	1/1	Aramburu, Rick	Aramburu & Eustis, LLP 720 Third Avenue, SUITE 2000 Seattle, WA 98104	10-Jan-18	Read emails and attachments from Line 21	Five studies have affirmed the need for this project. Two of those studies were conducted by independent experts for the City of Bellevue and the Environmental Impact Statement (EIS) team. Independent consultants hired by the City of Bellevue and our professional transmission planners verified the need for the Energize Eastside Project.
23	1/1	Smith, Dean	Bellevue, WA	7-Mar-18	PLEASE....Don't let PSE get away with their costly, unnecessary, nature and neighborhood destroying Energize Eastside project. Don't let a foreign owned monopoly ruin our cities.	Comment noted.
24	1/1	Simmons, DeEtta		10-Mar-18	Dear Ms. Bedwell, I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced. Sincerely, [YOUR NAME] [YOUR ADDRESS]	Please see the attached Comment Response Summary.
25	1/1	LeVeque, Marcia	3625 Lake Washington Blvd N, Renton, WA 98056	10-Mar-18	I'm against PSE getting approval for their Energize Eastside project. Current studies have shown that there is insufficient need for this project. The large poles and transmissions lines do not belong in our beautiful neighborhoods. I believe battery storage is an idea that should be addressed. Many other cities are already doing this. Our area is very progressive and I feel the current Energize Eastside project is definitely a step backwards.	Please see the attached Comment Response Summary and 2015/2018 reports by Strategen Consulting.
26	1/1	Moore, Bob	4707 135th Place SE Bellevue, WA 98006	10-Mar-18	Something is terribly wrong in our community. How is it that a foreign-owned utility can construct a billion dollar project in the middle of our city to expand electrical transmission capacity at a time when demand is declining and safer, cheaper and more environmentally friendly alternatives are available? This is a backward move that industrializes our neighborhoods and costs our citizens billions of dollars for the benefit of foreign investors. This is not consistent with the vision the City Council	Please see the attached Comment Response Summary.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					members such as Conrad Lee articulate to our citizens. (See the Bellevue City Council Newsletter) There is a huge disconnect. I hope our political leaders and regulators will step up and challenge this albatross.	
27	1/1	Orth, Roger & Karen	4530 Somerset Drive SE Bellevue, WA 98006	9-Mar-18	Please list me as a **party of record** against the project. There is inadequate need to cause such a blight on the neighborhood.	Please see the attached Comment Response Summary.
28	1/1	Voetberg, Clair J. & Maxine	4544 Somerset Place SE, Bellevue, WA 98006	9-Mar-18	Dear H Bedwell, I am writing you to register my protest to the permitting of this project. Completion of this unnecessary project will significantly ruin the views I now enjoy on Somerset hill it will diminish the value of my property.	Please see the attached Comment Response Summary.
29	1/1	Gable, Jodi	5700 143rd Pl SE, Bellevue, WA 98006	14-Mar-18	Please make me a party of record for the PSE permit process for Bellevue South and North. When there were hearings about the sale of PSE to foreign investors, I was very opposed to this sale and this is exactly why. It is evident, very evident, that this is a money grab by PSE for the investors. Though my views are not impacted by this project, I have been following it closely and read a great deal about it. I've also read numerous articles in the Wall St Journal and elsewhere about battery options that are presently being used elsewhere in the country and battery technology is rapidly improving. This has not been adequately explored or considered. I strongly believe there is no need for this project and that there are much better solutions for any issues the City of Bellevue might encounter in the future with regards to electricity. This project is wrong and I hope that the City of Bellevue has the integrity to stop it now.	Please see the attached Comment Response Summary and 2015/2018 reports by Strategen Consulting.
30	1/1	Souder, Charles & Shirley	4417 Somerset Drive SE, Bellevue, WA 98006	10-Mar-18	Send your name and address to Heidi Bedwell, hbedwell@bellevuewa.gov to be a party of record, as stated in the notice at bottom of this page. This will preserve your right to file an appeal later if so desired and it will let the City know you do not want the City to approve the PSE application. This impacts my property; concerns about safety during construction around pipelines; the insufficient proven need for this project; the inadequate evaluation of non wired alternatives such as battery storage or demand response techniques; or the inappropriate placement of industrial sized poles and transmission wires. Two points in the Bellevue Land Use Code back this up: 1. a project must protect single family neighborhoods from encroachment by more intense uses, and 2. design must be compatible with intended character of the property and the immediate vicinity.	Please see the attached Comment Response Summary and 2015/2018 reports by Strategen Consulting. 1) The transmission line project will upgrade existing transmission lines within an existing transmission corridor, which has been in existence since the 1920s and early 1930s. Using this corridor avoids encroachment into neighboring single-family areas. The vast majority of the area development has occurred around the transmission corridor, which was established in the late 1920s and early 1930s. Any single family neighborhoods adjacent to the proposed line are already adjacent to the existing transmission lines. The utility corridor is part of the existing character of these areas. PSE is proposing to replace the existing 115 kV transmission poles with steel poles to accommodate 230 kV conductors. The poles will generally be installed in the same location or in close proximity to the existing poles. In most cases, the number of poles will be reduced from four to one or two. The consistency of the proposed transmission lines with other uses in the vicinity was confirmed by the Phase 2 DEIS, which found that impacts to land use will be "be less-than-significant because [the proposed project] is consistent with city and subarea plans, and would not adversely affect existing or future land use patterns." DEIS at 3.1-37. 2) Richards Creek Substation. The property currently serves as a pole storage yard and has a utility corridor with existing transmission lines, water pipelines, and a petroleum pipeline through the center of the site. It is well screened from surrounding uses by mature vegetation. The site is surrounded to the north by

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
						PSE's existing Lakeside Switch substation, to the west by industrial development including a water and wastewater supply company, to the south by King County's Factoria Solid Waste Transfer Station, and upslope to the east by a stormwater detention facility tract that is heavily vegetated. The substation use is consistent with the uses in the area and the current use of the site. Located within the Light Industrial (LI) zoning district, the existing site screening will be enhanced with the Richards Creek culvert replacement project and stream restoration and enhancement proposal.
31	1/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 1: Bifurcated Permit (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. What are the risks associated with splitting this project?	PSE is unaware of any risk caused by constructing the project in two phases, and the phased construction has always been planned for operational reasons.
32	2/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 1: Bifurcated Permit (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. How will the project work and function if only one-half is built?	The development and construction schedule relates to constructability and to minimizing planned outages during construction that would make the transmission network system vulnerable to reliability. This does not imply that constructing half of the project would address the need fully.
33	3/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 1: Bifurcated Permit (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. What happens if one segment encounters permitting problems?	The question does not provide an adequate level of specificity to provide a response; permitting matters are addressed as they arise.
34	4/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 1: Bifurcated Permit (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. What new Olympic pipeline risks are incurred when operating half of a transmission line?	Please see the attached Comment Response Summary.
35	5/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 1: Bifurcated Permit (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 5. How would an incomplete transmission line increase reliability to customers?	The principal component of the Energize Eastside project is the new transformer at Richards Creek substation. The transmission lines are needed to energize the transformer. An incomplete project would not meet PSE's federal planning obligations.
36	6/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 2. Inadequate Public Outreach (SEPA EIS Element) (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. How will the City of Bellevue address inadequate Public Notice?	Question is addressed to the City.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
37	7/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 2. Inadequate Public Outreach (SEPA EIS Element) (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. What steps will the City take to increase public awareness and provide adequate Public Notice to residents and require PSE to notify ALL affected customers?	Question is addressed to the City.
38	8/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 2. Inadequate Public Outreach (SEPA EIS Element) (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Will the City of Bellevue justify the short review period provided for the Application Permit, given that a 4,000+ page FEIS was just provided to the general public on March 1, 2018? To add insult to injury, the City is charging $275 to obtain a copy.	Question is addressed to the City.
39	9/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 3. Non-standard EIS Process (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. Please provide an explanation, legal justification, and examples of other DEIS and EIS that have been recently prepared following the same approach that the City of Bellevue has employed on the Energize Eastside EIS.	Question is addressed to the City.
40	10/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 3. Non-standard EIS Process (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. Viable Alternatives: PSE's technical consultants claimed to have asked the WA Department of Ecology for permission to install a peaking generator but was turned down. Where is that report? Why is PSE's request, Department of Ecology's response, and the report not included in the DEIS or other public records? Please detail why the cost and environmental impact to install a peaking generator is more than the environmental impact of the proposed Energize Eastside project. Where is the comparative analysis of those two alternatives?	PSE is unaware of specific conversations with or reports prepared in regard to Washington Department of Ecology (WDOE). To the best of PSE's knowledge, WDOE does not issue permissions to install electrical generation facilities. Additionally, the EIS partner cities had no interest in entertaining the idea of a power plant within their boundaries. Please see the Phase 1 Draft EIS at Section 2.3.3.3 regarding generation alternatives evaluated.
41	11/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 3. Non-standard EIS Process (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Where is the comprehensive, up-to-date analysis of Battery Storage to satisfy the Eastside's future electricity needs? Where is the comprehensive comparative analysis between NWAs and Energize Eastside?	Please see the 2015 Eastside System Energy Storage Alternatives Assessment and 2018 Report Update by Strategen Consulting. PSE continues to evaluate alternative solutions, such as batteries, and has determined that these alternatives are not a practical solution for our transmission deficiency.
42	12/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 4. Alternatives (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. How will the City of Bellevue explain why batteries can, or cannot, meet the Eastside's peak demand needs?	Question is addressed to the City; additionally, please refer to the 2015 Eastside System Energy Storage and Alternatives Assessment and subsequent 2018 Report Update by Strategen Consulting.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
43	13/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 4. Alternatives (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. How will the City of Bellevue ensure it is working on behalf of its citizens to provide reliable, "Lowest Reasonable Cost" electricity by examining viable alternatives?	Question is addressed to the City.
44	14/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 4. Alternatives (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. How will the City of Bellevue justify excessive infrastructure environmental damage (and economic consequences) in the face of lower cost, more reliable, safter alternatives?	Question is addressed to the City.
45	15/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 5. Low Impact Development (LID) Principles and Tree Canopy (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. How will the City justify building Energize Eastside, which violates Low Impact Development (LID) principles enacted by City Ordinances? Specifically, how will the City respond to criticism that LID-protected tree canopy will be destroyed and require decades to recover? LID is about more than storm water management and slope retention.	Question is addressed to the City; however, PSE will comply with the City's requirements for "hard surfaces" and "impervious surfaces" per Chapter 20.20 of the Bellevue Land Use Code. This will be detailed as part of the Project's Clearing and Grading Permit process. Proposed landscaping and re-vegetation will be done in compliance with Section 20.25A of the Bellevue Land Use Code.
46	16/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 5. Low Impact Development (LID) Principles and Tree Canopy (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. Where are the air quality analyses in the permit application or DEIS? What will this transmission line do to air quality in the region during construction as well as during long-term (decades) of operation?	Please see Section 4.5 of the Final Environmental Impact Statement (FEIS).
47	17/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 5. Low Impact Development (LID) Principles and Tree Canopy (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. The permit application discusses steep slope retention and water management, but carefully avoids in-depth discussion of tree canopy and analysis of air quality. Why?	Vegetation removal will be detailed under the Project's Clearing and Grading Permits from the city of Bellevue. Air quality for the project is analyzed within the FEIS (refer to Section 4.5).
48	18/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 5. Low Impact Development (LID) Principles and Tree Canopy (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. Appendix D (pg 172 South Bellevue Critical Areas Report) classifies about two thirds of the removed vegetation as “Permanent”, “Conversion”, or “Temporary Impact”, where long-term recovery remains undefined. While PSE appears to have completed an inventory of vegetation loss, where is the analysis of the long-term impact of this vegetation loss, particularly as it relates to air quality in the region?	Carbon sequestration (the process in which atmospheric CO2 is taken up into plants or soil and subsequently “trapped") is discussed in Section 4.5 of the Project's FEIS. Per the FEIS, construction of any of the segments and the Richards Creek substation site would result in some level of sequestration losses due to tree removal; however, the emissions would be substantially below the State of Washington reporting threshold of 10,000 metric tons and, therefore, less-than-significant. Refer to Section 4.5 of the FEIS for more information.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
49	19/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 5. Low Impact Development (LID) Principles and Tree Canopy (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 5. The DEIS and permitting only addresses short-term light and glare concerns during the construction phase. How will the City of Bellevue mitigate long-term light and glare concerns?	After project construction, light and glare impacts are not anticipated from project operations or maintenance activities. The only lighting proposed for the project is at the new Richards Creek Substation, where lighting would be downward-directed and interior to the project site - eliminating light and glare on adjacent properties. Steel poles will be coated with non-reflective materials to eliminate potential for glare.
50	20/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 5. Low Impact Development (LID) Principles and Tree Canopy (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 6. Will poles up to 110 feet tall require flashing beacons to alert low flying private aircraft of tall aerial obstructions, especially in areas that cross I-90 or higher elevations like Somerset?	PSE works with the Federal Aviation Administration to ensure compliance with the appropriate requirements. No lighted beacons are anticipated as part of the project.
51	21/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. How can Energize Eastside be deemed an EPF when it has been independently shown NOT to be essential to other directly affected jurisdictions (Renton, Newcastle, Redmond, and Kirkland)? PSE publically states that Energize Eastside is intended to serve block loads in Bellevue – not other jurisdictions. (DEIS pg 1-6) Which block loads? Why isn't PSE publically disclosing block load shortages (if they exist) and anticipated block loads in their application?	The project has not been deemed an Essential Public Facility (EPF). Specific customer data (block loads) are not shared by PSE with the public. However, Energize Eastside is intended to serve future loads including spot/block loads that are predominantly in the Eastside area and in Bellevue. PSE's load forecasting over next 20 years have incorporated all the block-loads anticipated company-wide. All these block-loads collectively drive the need for this project. The information on these block-loads is publicly available information and comes from cities and jurisdictions. PSE is not generating this load and hence does not require it to provide that information in the applications. Some examples of these loads are Sound Transit, Spring District development, Bellevue/Redmond/Renton downtown developments.
52	23/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. How will the City justify the erroneous application of the Essential Public Facility designation on Energize Eastside, when transmission lines are specifically and intentionally omitted from the legal definition for an "Essential Public Facility"?	Question is addressed to the City.
53	24/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Why hasn't PSE petitioned EFSEC to address the Energize Eastside project?	EFSEC does not have statutory authority over this project.
54	25/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. Why aren't City Staff and City Council pressing PSE on this question to get a full, accurate, and well-reasoned answer as to why PSE is not presenting the Energize Eastside project to EFSEC, instead of pressuring City Staff and	Question is addressed to the City.

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					City Councils on the Eastside?	
55	26/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 5. Why aren't PSE's answers to the EFSEC question being publically disclosed to inform the general public?	Please see the attached Comment Response Summary.
56	27/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 6. Will the lingering questions and questionable data justifying the Energize Eastside project withstand analysis and scrutiny by EFSEC?	EFSEC does not have jurisdiction over the project.
57	28/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 6. Energize Eastside is Not an Essential Public Facility (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 7. What does the City of Bellevue (acting as SEPA Lead Agency) have to lose by denying the Energize Eastside permits, thereby forcing PSE's hand to submit Energize Eastside before EFSEC? The four jurisdictions need not fear a lawsuit from PSE. The City can legitimately argue that PSE has the option and recourse to appeal before EFSEC before seeking relief in court. The City of Bellevue is within its rights to require PSE to obtain a full analysis from EFSEC on the Energize Eastside project before issuance of permits.	Question is addressed to the City; however, please see the attached Comment Response Summary. Additionally, EFSEC does not have jurisdiction over the project.
58	29/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 7. Build Environment (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. Where are the studies showing that NERC/FERC requirements have been met for homes that are within the "fall zone" of the proposed 100ft+ tall monopoles?	NERC/FERC do not require analysis of a "fall zone"
59	30/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 7. Build Environment (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. What studies can the City provide to assure homeowners that they will continue to qualify for home lending and homeowner's insurance?	Question is addressed to the City; however, NERC/FERC do not require analysis of a "fall zone"
60	31/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 8. NEPA Review (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. Why has the City of Bellevue overlooked crucial binding documentation requiring Energize Eastside to submit for NEPA review?	The question is addressed to the City.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
61	32/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 8. NEPA Review (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. If BPA is not involved in Energize Eastside, why are there BPA Memoranda of Agreement (MOA) included on the City of Bellevue EIS scoping website? http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/2015-06-01_moa_with_bpa-seattlecitylight-pse.pdf	PSE is part of an integrated system. Appropriate planning with interconnected utilities is a prudent practice. See 2015 letter from BPA to the City of Bellevue.
62	33/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 8. NEPA Review (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Why would Seattle City Light pay PSE, if Energize Eastside is solely to address Puget Sound eastside (local) load growth?	The provided statement is incorrect. Seattle City Light is not paying for any part of Energize Eastside.
63	34/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 8. NEPA Review (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. Where is the WA Department of Ecology determination of the need for a NEPA review?	WDOE does not implement does not determine the need for review under NEPA.
64	35/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. Why has the City of Bellevue not hired electrical reliability expertise as recommended in 2012 by EXPONENT?	Question is addressed to the City.
65	36/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. How does the City of Bellevue respond to criticism that the Eastside Needs Assessment Report contains assumptions that far exceed NERC Reliability Standards, while providing no measurable increase in reliability for PSE customers?	Question is addressed to the City. Federal regulations require that utilities plan a reliable system based on forecasted loads. The City of Bellevue's retained Utility System Efficiencies, Inc. (USE), and independent expert in transmission planning to perform an Independent Technical Analysis of Energized Eastside. USE's report, dated April 28, 2015 (Page 4) concluded that PSE has followed industry practice in forecasting its demand load, incorporating the four major components of forecasting. Additionally, exceedance of the 2018 summer peak forecast occurred in 2017, which shows that the forecasts that PSE used in its planning studies are accurate.
66	37/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Why isn't the City pressing PSE to provide documented evidence – NERC regulations "chapter and verse" - describing the precise federal requirements that PSE is required to meet?	Question is addressed to the City; however, PSE follows the NERC TPL-001-4 requirements to analyze our transmission system that is part of the Bulk electric system of Western Interconnection. These requirements are publicly available on NERC 's website.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
67	38/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. Why isn't the City pressing PSE to provide evidence of why PSE chose to include N-9 layered assumptions that overly stresses then entire Bulk Electric System (BES), instead of NERC-mandated N-2 requirements?	Question is addressed to the City; however, the need for Energize Eastside has been validated by numerous independent industry experts that PSE followed the appropriate planning procedures. PSE follows the NERC TPL-001-4 requirements to analyze its transmission system as part of the Bulk electric system of Western Interconnection. These requirements are publicly available at NERC website.
68	39/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 5. How does the City of Bellevue respond to criticism that there are less expensive ways to address overloads at the Talbot Hill substation in lieu of building Energize Eastside?	Question is addressed to the City; however, please see the attached Comment Response Summary.
69	40/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 6. Quanta, U.S.E and Stantec (PSE consultants) will NOT take a stance against PSE for fear of retaliation in the form of losing future lucrative consulting contracts from PSE and other utilities. How does the City of Bellevue respond to clear conflicts of interest on the part of Quanta (known to do substantial work for PSE's owner, Macquarie), U.S.E., and Stantec?	Opinion is noted. Question is addressed to the City; however, it is noted that the comments do not demonstrate that there is a conflict of interest.
70	41/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 7. Stantec did not independently analyze PSE's load forecast. Stantec accepted PSE's inputs as fact and verified that PSE had followed an industry-standard process. Why didn't Stantec obtain independent data from unbiased third-parties, rather than rely strictly on data provided by PSE?	Question is addressed to the City. Federal regulations require that utilities plan a reliable system based on forecasted loads. The City of Bellevue's retained Utility System Efficiencies, Inc. (USE), and independent expert in transmission planning to perform an Independent Technical Analysis of Energized Eastside. USE's report, dated April 28, 2015 (Page 4) concluded that PSE has followed industry practice in forecasting its demand load, incorporating the four major components of forecasting. Additionally, exceedance of the 2018 summer peak forecast occurred in 2017, which shows that the forecasts that PSE used in its planning studies are accurate.
71	42/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 9. Critique of "5 Independent Studies" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 8. How will the City of Bellevue ensure they are making the best long-term decisions for residents to provide reliable, "Lowest Reasonable Cost" electricity?	Question is addressed to the City.
72	43/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 10. Corrective Action Plans, NERC Requirements (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. Why isn't the City pressing PSE for details about Corrective Action Plans (CAPs) that PSE has already initiated? Has PSE resorted to any CAPs to keep the lights on? The City should report publically exactly what corrective actions (if any) PSE has already taken.	Question is addressed to the City; however, PSE's corrective action plans are confidential and contain Critical Energy Infrastructure Information (CEII).

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
73	44/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 10. Corrective Action Plans, NERC Requirements (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. Which specific regulations (NERC Standards "chapter and verse") recently changed that require PSE to increase reliability from an N-2 scenario to an N-9 scenario? Why has PSE layered on assumptions about sending 1,500MW to Canada, simultaneous with weekday morning temperatures below 23F, simultaneous with 2 of 4 transformers offline, all while 6 west-of-Cascade emergency generators owned by PSE - and 5 other non-PSE owned emergency generators - are offline? Where is the NERC requirement mandating those assumptions? Specifically, what requirements recently changed that require all of these additional extreme assumptions to be layered upon the WECC 2018 Base Case?	Please see the attached Comment Response Summary. PSE follows the NERC TPL-001-4 requirements to analyze its transmission system that is part of the Bulk electric system of Western Interconnection. These requirements are publicly available on the NERC website. The TPL-001-4 requirement R2.7 states "…when the analysis indicates an inability of the System to meet the performance requirements in Table 1, the Planning Assessment shall include Corrective Action Plan(s) addressing how the performance requirements will be met." During the planning process it is required for us to develop CAPs wherever the system would not satisfy the performance requirements. Table 1 of the TPL standard includes various contingencies that need to be studied at peak on various sensitivity cases. The adherence to the TPL standard ensures greater grid reliability and mitigates any future grid-wide black-outs.
74	45/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 10. Corrective Action Plans, NERC Requirements (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Why isn't the City insisting on PSE to carefully distinguish between "Path Rating" and "Firm Requirement" for electricity transfers to Canada? Why isn't the City pressing PSE to re-run load flow studies without the additional layered assumptions on the WECC 2018 base case?	Question is addressed to the City; however, the need for Energize Eastside has been validated by numerous independent industry experts that confirm that PSE followed the appropriate planning procedures. The work of PSE's transmission planners has been validated by independent experts for the City of Bellevue and the Partner Cities' Environmental Impact Statement (EIS) Team. In the Final EIS, the EIS Team noted: "The EIS Consultant Team confirmed that the needs assessment was conducted in accordance with industry standards for utility planning. No change in Final EIS. See Key Theme OBJ-2 in Appendix J-1." Final EIS, Section 6.2, page 6-3. Operationally, there are always power flows across the norther intertie. Typically, the power flows from north to south during the summer and south to north in the winter. However, as stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "The Optional Technical Analysis examined this issue by reducing the Northern Intertie flow to zero (no transfers to Canada). Although this scenario is not actually possible due to extant treaties, it was modeled to provide data on the drivers for the EE project, to examine if regional requirements might be driving the need. The results showed that in winter 2017/18, even with the Northern Intertie adjusted to zero flow, the Talbot Hill 230/115 kV transformer #2 would still be overloaded by several contingencies (several different outage scenarios). Again, the projected overloads indicate a project need at the local level to meet reliability regulations."
75	46/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 10. Corrective Action Plans, NERC Requirements (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. Why isn't the City pressing WECC for straight answers? Has anyone at the City reached out to WECC to get reliable data? Why isn't WECC holding PSE accountable?	Question is addressed to the City and WECC.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
76	47/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 11. Misleading Threats of "Rolling Blackouts" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. Why does the "backbone" - this particular existing PSE 115kV transmission line – need to be upgraded if we can live without it for 9 months at a time? Mr. Jens Nedrud (former PSE Senior Project Manager on Energize Eastside) stated that this existing line can be taken out of service for up to 9 months without grid ramifications.	TPL-001-4 standard also requires stressing the system to a reasonable level when evaluating the performance of the system to make sure that the system is robust enough to do system maintenance and also keep the system available for day-to-day operations. Hence the planning process is obligated to analyze the bookends and extreme situations that could happen in reality. In order to satisfy these performance requirements with future load growth, a CAP consisting of rolling black-outs is inevitable if the Energize Eastside project is not put in place based on current load forecasts. It is the obligation of every planner to provide a system that could provide reliable power during day-to-day operations. The operating world is governed by another set of operations NERC standards (TOP, BAL, EOP) that they need to adhere to support the reliability of the grid. It is up-to the operator to when, whether and how to arm the CAPs.
77	48/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 11. Misleading Threats of "Rolling Blackouts" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. Are there better ways to handle the other 3 months – periods of possible (not guaranteed) peak demand? Why isn't the City considering other less costly, less environmentally damaging viable alternatives to provide the most reliable electricity at the lowest fair price to consumers?	Question is addressed to the City; however, PSE has thoroughly explored various solutions to the Eastside need as evidenced by PSE's Solution Study (2014) and Supplemental Solution Study (2015). PSE has rigorously studied many non-wire new technology solutions as evidenced by the E3 (2014) and Strategen (2015/2018) reports.
78	49/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 11. Misleading Threats of "Rolling Blackouts" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Why isn't the City pressing PSE for the facts about BPA's automated curtailment system? How many times has BPA had to use this system in the last 5 years? Last 10 years? What has the trend looked like over the past 10 years? Is usage of this system over the last 10 years increasing or decreasing? Which way is power flowing during peak demand periods (cold weekday mornings below 23F) – from the U.S. to Canada, or from Canada to the U.S.?	Question are addressed to the City and BPA; however, PSE lacks knowledge of and cannot speak to or represent BPA's operational data.
79	50/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 12. Customer Demand Forecast and "Heat Map" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 1. During 2017, how close did the Puget Sound Eastside come to experiencing rolling blackouts? How many CAPS did PSE implement to maintain electricity to the region?	Exceedance of the 2018 summer peak forecast occurred in 2017, which shows that the forecasts that PSE used in its planning studies are accurate, although a bit conservative. As stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "Several hypothetical scenarios were studied as part of the Optional Technical Analysis (OTA). Each one showed overloads in the 2017/18 timeframe, indicating project need in order for PSE to meet federal regulatory requirements for system reliability."

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
80	51/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 12. Customer Demand Forecast and "Heat Map" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 2. Which PSE forecast is accurate? How accurate are any of PSE's forecasts? Why isn't the City pressing PSE for the past 10-to-12 years of historical data, so we can see the real trend line? Seattle City Light makes that data readily available to the public. PSE has denied public requests for that data.	A portion of the comments are directed at the City; however, exceedance of the 2018 summer peak forecast occurred in 2017, which shows that the forecasts that PSE used in its planning studies are accurate, although a bit conservative. As stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "Several hypothetical scenarios were studied as part of the Optional Technical Analysis (OTA). Each one showed overloads in the 2017/18 timeframe, indicating project need in order for PSE to meet federal regulatory requirements for system reliability." The magnitude and or duration of such overloads are not part of the federal planning standards, only that an overload is identified on the system. Federal regulations require that utilities plan a reliable system based on forecasted loads. The City of Bellevue's Independent Expert Utility System Efficiencies, Inc. (USE) reported in Independent Technical Analysis of Energized Eastside, April 28, 2015 Page 4 - USE concluded that PSE has followed industry practice in forecasting its demand load, incorporating the four major components of forecasting.
81	52/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 12. Customer Demand Forecast and "Heat Map" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 3. Why isn't the City pressing PSE to provide realistic electricity growth rates for the region? Electricity growth rate is not the same as economic and population growth rates. The Federal Energy Information Administration (EIA) says, "…the long-run trend of slowing growth in electricity use relative to economic growth will continue: the rate of projected growth in electricity use will less than half the rate of economic growth…" http://www.eia.gov/todayinenergy/detail.cfm?id=10491	Question is addressed to the City; however, it should be noted that the commenter confuses electricity use with electricity demand. Federal regulations require that utilities plan a reliable system based on forecasted loads. The City of Bellevue's retained Utility System Efficiencies, Inc. (USE), and independent expert in transmission planning to perform an Independent Technical Analysis of Energized Eastside. USE's report, dated April 28, 2015 (Page 4) concluded that PSE has followed industry practice in forecasting its demand load, incorporating the four major components of forecasting. Additionally, exceedance of the 2018 summer peak forecast occurred in 2017, which shows that the forecasts that PSE used in its planning studies are accurate.
82	53/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 12. Customer Demand Forecast and "Heat Map" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 4. What would possess PSE to create a "Heat Map" illustration that overly exaggerates a worst case scenario that could never possibly occur in real life?	The Heat Map shown in the Needs Assessment Section 2.3 - King County Area Description, was used as an illustration of the most densely populated areas of King County. The graphic shows the most densely populated areas in red, which include Kenmore, Kirkland, Redmond, Bellevue, and Renton; nothing more.
83	54/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 12. Customer Demand Forecast and "Heat Map" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** 5. Why isn't the City pressing PSE for an explanation of how PSE created this "Heat Map" graphic, and why is it included in PSE's Eastside Needs Assessment Report? This report provides crucial supporting documentation for PSE's permit application and the EIS. This report should not contain inaccurate or misleading information.	Question is addressed to the City; however, the Heat Map shown in the Needs Assessment Section 2.3 - King County Area Description, was used as an illustration of the most densely populated areas of King County. The graphic shows the most densely populated areas in red, which include Kenmore, Kirkland, Redmond, Bellevue, and Renton; nothing more. The report does not include inaccurate or misleading information.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
84	55/55	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	10-Mar-18	**Topic 12. Customer Demand Forecast and "Heat Map" (See attachment Energize Eastside Permit Questions 2018-03-09.pdf for detailed background on questions)** Why isn't the City requesting 10 years' worth of historical data on peak loads on each of Bellevue's 29 substations to verify the accuracy of PSE's statements? Where are those peak loads occurring? Which specific substations are experiencing peak loads? When did those peak loads occur? For how long did they last? How much above the substation transformer nameplate rating were those peaks? How would Energize Eastside specifically address those peak load events? How is the City independently verifying PSE's claims?	Questions are addressed to the City. To verify PSE's studies, the City of Bellevue's hired an independent expert, Utility System Efficiencies, Inc. (USE) to prepare an Independent Technical Analysis of Energized Eastside, April 28, 2015 Page 4. USE concluded that PSE has followed industry practice in forecasting its demand load, incorporating the four major components of forecasting.
85	1/1	Bowers, Jarvis	13609 NE 28th St, Bellevue WA 98005	12-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 2. I'm concerned about noise pollution from the new power lines. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary. Section 6.13 of the FEIS states: "Corona noise was analyzed as a part of the Phase 1 Draft EIS and was found to be relatively low for nearby residential environments and virtually the same as existing noise levels, which is well below the limits required by local noise regulations."
86	1/1	Cox, Sean	4538 Somerset Dr. SE Bellevue, WA 98006	8-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. 5. PSE and the EIS process have failed to address the risks of this project due to the potential death and damage that these new lines will cause during a major landslide or seismic event. Quoting we follow national standards does not address the fact that the additional height of the lines will result in them falling through a substantial number of homes due to the unique environment and risks we face in the PNW. PSE has a history of claiming it's an act of god and not being held responsible for past events which have resulted in damage to homes by their lines. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary. Additional information can be found in the EIS.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
87	1/1	Dehmlow, Sue	1720 140th Ct SE Bellevue 87007	8-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. 2. PSE is in the business of generating income to it's shareholders and doesn't have our interests at heart. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary.
88	1/1	Ray, Don	134 130th Ave NE, Bellevue, WA 98005	16-Mar-18	As a former nuclear power plant operator I can tell you PSE has never properly justified the CURRENT need for this expensive expansion. As a former president of a local software firm, I feel this PSE expansion is a business manipulation for profits and not in the long term financial interest of us rate payers. I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary. Operation of a power plant is very different than planning and operating the electrical system.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
89	1/1	Dontireddy, Sirisha		13-Mar-18	I would like to be party of record for CUP and CALUP applications. My name is Sirisha Dontireddy and my address is 4617 135th PL SE, Bellevue, WA 98006. I have serious concerns regarding PSE's Energize Eastside project. 1. Safety concerns: Energize Eastside's proximity to ageing Olympic pipeline. This is earthquake prone area and having high powered transmission lines so close to the pipeline can be disastrous. 2. Impact on my property: Not many people would want to buy a home that's close to high transmission power lines because of the exposure high levels of EMFs. 3. Views: Somerset neighborhood is cherished for its breathtaking views. These very tall, huge powerlines will totally dice the view up. Thank you for your consideration!	Please see the attached Comment Response Summary. The Energize Eastside project will replace existing transmission lines in an existing corridor that has been in operation since the late 1920s and early 1930s. Additional information can be found in the EIS.
90	1/1	Erskine, Jessica	1861 140th Ave SE, Bellevue, WA 98005	13-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary. Additional information can be found in the EIS.
91	1/1	Esayian, Karen and Sam	4601 135th Ave SE, Bellevue, WA 98006	9-Mar-18	Please record Sam and Karen Esayian , 4601 135th Ave SE, Bellevue, WA 98006, as party of record for comments on the PSE Bellevue South Application for Energize Eastside. Our general concerns are for those also stated in the LUC for Bellevue: protecting single family neighborhoods from encroachment by more intense uses and the proposal to use a design that contradicts the intended character of a neighborhood. In addition, we have concerns about safety during construction adjacent to the pipelines and the inadequate evaluation of non wired alternatives. Further comments will follow.	The transmission line project will upgrade existing transmission lines within an existing transmission corridor, avoiding new encroachment into neighboring single-family areas. The vast majority of the area's development has occurred around the transmission corridor, which was established in the late 1920s and early 1930s. Any single family neighborhoods adjacent to the proposed line are already adjacent to the existing transmission lines.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
92	1/1	Evans, Alice	2455 127th Ave NE, Bellevue, WA 98005	7-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced. PSE has misrepresented this project from day one—beginning by sending a post card stating that WHO listed exposure to EMF as not having a deleterious effect on the human body. In fact, at that time, WHO listed exposure to EMF as Category 2B—a possible human carcinogen. In addition to the reasons cited above, their project also will impact our health.	Please see the attached Comment Response Summary. PSE disagrees with the commenter's opinion regarding the project. Additional information about EMF can be found in Section 4.8 of the FEIS.
93	1/1	Hazen, Lisa		7-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary.
94	1/1	Johnston, Pam	3741 122nd Ave NE, Bellevue, WA 98005	5-Mar-18	Please add me as a party of record for Energize Eastside.	Comment is addressed to the City.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
95	1/1	Judkins, Kathy	4324 136th Pl SE, Bellevue, WA 98006-2237	13-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. 5. For me personally this project will place a huge steel pole in my yard within a few feet of my garage and the Olympic Pipeline. My driveway will be damaged as well as the private access road to my home and 7 neighbors homes. This road is the only access to my home. During the project I will have no automobile access to my home. I am 72 years old and a widow and have a congenital back issue so will not be able to climb up many stairs to get to my house. Also a tree over 50 years old will be cut down. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary. Additionally, PSE has reached out, and will continue to reach out, to property owners along the corridor to discuss and clarify revegetation and access plans.
96	1/1	Kaiboriboon, Kitti	13553 NE 54th Pl, Bellevue, WA 98005	14-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary.
97	1/1	Kaner, Rick	6025 Hazelwood Lane SE, Bellevue, WA 98006	12-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
98	1/1	Lakshmanan, Valliappa	4552 Somerset Dr. SE , Bellevue WA 98006	10-Mar-18	I am writing to ask that Bellevue NOT approve PSE's application to build Energize Eastside because there are several less expensive ways to provide additional power without destroying thousands of valuable urban trees, increasing risk of petroleum leaks and being an eyesore. I would like to be notified about public hearings.	Comment is addressed to the City.
99	1/1	Moore, Margaret	4707 135th Place SE Bellevue, WA 98006	9-Mar-18	I would like to be listed as a party of record to preserve my right to file an appeal later if I so desire. We do not want the City of Bellevue to approve the PSE application as it is now configured. PSE must be required to consider alternative solutions to their perceived potential energy disruptions which are more up-to-date, environmentally relevant and less intrusive. Two points in the Bellevue Land Use Code pertain to the current situation: 1. A project must protect single family neighborhoods from encroachment by more intense uses. 2. (The) design must be compatible with intended character of the property and the immediate vicinity. Through the 18 mile length of the proposed power lines, both of these elements will be violated and must be considered by both PSE and the Bellevue City Council before any further action is taken.	Please see the attached Comment Response Summary. 1) The transmission line project will upgrade existing transmission lines within an existing transmission corridor, avoiding encroachment into neighboring single-family areas. The vast majority of the area development has occurred around the transmission corridor, which was established in the late 1920s and early 1930s. Any single family neighborhoods adjacent to the proposed line are already adjacent to the existing transmission lines. The utility corridor is part of the existing character of these areas. PSE is proposing to replace the existing 115 kV transmission poles with steel poles to accommodate 230 kV conductors. The poles will generally be installed in the same location or in close proximity to the existing poles. In most cases, the number of poles will be reduced from four to one or two. The consistency of the proposed transmission lines with other uses in the vicinity was confirmed by the Phase 2 DEIS, which found that impacts to land use will be "be less-than-significant because [the proposed project] is consistent with city and subarea plans, and would not adversely affect existing or future land use patterns." DEIS at 3.1-37.
100	1/1	Mansfield, Peter	4568 Somerset Place SE, Bellevue, WA 98006	9-Mar-18	Please add my name as a party of record NOT in favor of the City of Bellevue granting a permit to PSE for any portion of their proposed Energize Eastside Project. I do not believe they have made their case for the necessity of this project nor do I believe they have adequately evaluated alternative methods to meet peak electrical power demands. Electrical energy delivery and distribution is in the process of being completely rethought on a national and international scale. It would be a mistake to allow, at this time, construction of additional high voltage power transmission lines and towers through our city. It is rapidly becoming old technology. I know we can do better. We are leaders after all.	Please see the attached Comment Response Summary. 2) Richards Creek Substation. The property currently serves as a pole storage yard and has a utility corridor with existing transmission lines, water pipelines, and a petroleum pipeline through the center of the site. It is well screened from surrounding uses by mature vegetation. The site is surrounded to the north by PSE's existing Lakeside Switch substation, to the west by industrial development including a water and wastewater supply company, to the south by King County's Factoria Solid Waste Transfer Station, and upslope to the east by a stormwater detention facility tract that is heavily vegetated. The substation use is consistent with the uses in the area and the current use of the site. Located within the Light Industrial (LI) zoning district, the existing site screening will be enhanced with the Richards Creek culvert replacement project and stream restoration and enhancement proposal.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
101	1/1	Marsh, Don		13-Mar-18	Dear Ms. Bedwell, The purpose of this letter is to express concerns CENSE has with Puget Sound Energys applications for a Conditional Use Permit and a Critical Areas Land Use Permit to construct a new 230kV to 115kV substation at Richards Creek and replace 18 miles of 115kV transmission lines between Renton and Redmond with 230kV lines. CENSE objects to PSEs project because: 1. PSEs data does not substantiate the need for the project. Therefore, the project is not a prudent investment of ratepayer dollars. 2. PSEs study of the safety risks posed by embedding 67 large-diameter power poles within feet of half-century-old pressurized petroleum pipelines is based on flawed assumptions. 3. PSEs evaluation of less-costly technologies available to enhance the reliability and resiliency of the Eastside power grid is inadequate. 4. The removal of thousands of valuable urban trees would damage communities and the environment. CENSE will submit additional comments at a later date.	Please see the attached Comment Response Summary. The comments do not provide specific information to support the claims being made. PSE has provided extensive documentation on the Energize Eastside project. The City's EIS provides numerous independent evaluations on the project.
102	1/1	Melman, Diana	6023 121st Ave SE, Bellevue, WA 98006	7-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. It bothers me that we are a world class city and yet the power lines in my neighborhood (New Port Hills) look like they will fall or come dangerously close to things bellow. I don't understand why we would spend more money on making our neighborhood even more insightly with larger power lines. I will never understand the need for it if we can invest that money and put the power lines in the ground. And I bet that there more people than I who would be willing to support this idea. Please don't force PSE's greedy investors interest on us who have to live with the consequence. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary.
103	1/1	Mickelson, Dave & Denise	4518 Somerset Dr SE, Bellevue, WA 98006-3062	9-Mar-18	Please add my wife & I to Party of Record for Energize Eastside. We strongly oppose the City approving the PSE application. PSE provided inadequate evaluation of non-wired alternatives.	Please see the attached Comment Response Summary and the 2015 Eastside System Energy Storage Alternatives Assessment and 2018 Report Update by Strategen Consulting.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
104	1/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	Please accept our comments on Energize Eastside File Number 17-120556-LB and17-1205657-LO. The original signed copy is being sent through the US mail to Development Services. **<u>Stormwater comments - Richards Creek 230 kV Substation:</u>** This is an industrial project site, with extensive use of galvanized materials containing zinc. The application incorrectly calls the entire site an "infrequently used maintenance access route". Minimum Requirement 5, onsite stormwater management is required and has not been satisfied. Minimum Requirement 6, runoff treatment, requires enhanced treatment for metals. There is currently no treatment provided for this industrial site. Minimum Requirement 7, flow control: There is no documentation of the detention vault sizing and function. The application must include a stormwater report that documents compliance with all minimum requirements and includes hydrologic modeling results for detention sizing and control structure. The lower half of the driveway / access road flows directly into the creek with no flow control, treatment or onsite stormwater management. The substation fails to meet LUC 20.25H.080.A.3.	A Construction Stormwater Pollution Prevention Plan (CSWPPP) has been prepared for the Richards Creek Substation project and will be submitted to the City of Bellevue as part of the Project's Clearing and Grading Permit for Richards Creek. The CSWPPP contains provisions for onsite stormwater management and flow control (met through the proposed detention vault, and includes calculations for the sediment pond sizing).

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
105	2/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**<u>Wetland comments - Richards Creek 230 kV Substation:</u>** This project requires a Section 404 permit and a Section 401 Water Quality Certification. Thresholds for Section 404 and 401 permitting require analysis of the entire project impacts, not just a partial phase in one municipality. Wetland D hydrology is provided by overbank flooding from Stream C. The new culvert will eliminate overbank flooding of wetland D. Project must fully mitigate the loss of wetland D. Project must complete a final mitigation report that includes mitigation goals, performance standards, monitoring and maintenance protocols, data sheets and rating forms, and contingencies for 5 year monitoring period. This project would increase storm runoff, by cutting trees on the east side and channelizing flow around the project site, and concentrating this runoff into new channels that discharge into wetland A at the NW corner of the development and discharge into Wetland H at the SW corner. These concentrated flows have the potential to cause long-term erosion through these wetlands and exacerbate downstream sediment deposition. The project would disrupt the hydrology of slope wetlands both upslope and downslope of the new stream channel. This project will create two upland berms running through the middle of Wetland A. Project is not adequately mitigating for these impacts. Project must include monitoring of the wetland area south west of the new stream channel.	The City does not have jurisdiction over the Clean Water Act sections 404 and 401 permit processes. Wetland D hydrology has been provided over time by a combination of overbank flooding and shallow, subsurface seepage heading downslope, towards the vicinity of the dead end of SE 30th Street. Our expectation is that the boundaries and functioning of Wetland D will not change appreciably due to the proposed stream channel restoration work. Overbank flows tend to occur during the winter when hydrology is already at or near the ground surface. Since the stream channel is angled down the slope, we anticipate that the stream will continue to provide near-surface hydrology to the downslope Wetland D areas resulting from water percolating into the porous streambed and then continuing subsurface through permeable soils downslope to supply wetland areas, as opposed to re-entering the channel. Mitigation plans along with a monitoring and maintenance plan for the 5-year monitoring period will be prepared for the project and reviewed/approved by appropriate agencies. Concentrated flows or long-term erosion is not anticipated at the Richards Creek Substation site. Stream and wetland bank revegetation will provide both short- and long-term erosion controls. New native plantings will provide increased soil stability and native vegetation that could potentially reduce velocity of peak flows; thereby improving wetland and stream buffer functions, along with increased channel dimensions and flow-carrying capacity. Although parts of Wetland A are contiguous with adjacent stream segments, the primary source of hydrology to the wetland is from groundwater seeps. As such, disruptions to hydrology from the stream restoration project are not anticipated. Wetland monitoring will be included in the project's monitoring and maintenance plan.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
106	3/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**<u>Culvert and stream channel comments - Richards Creek 230 kV Substation:</u>** This project's new Culvert and new stream channel require Hydraulic Project Approval (HPA) and 401 Water Quality Certification permits. The long-term impacts and disruption to existing wetlands and streams does not justify the bermed stream channel which would be disconnected from adjacent wetlands. The new culvert and stream channel would increase peak flows to downstream systems. Proposed culvert has a sediment trap within the structure. This is an illegal structure. There is no plan or design for maintenance cleaning of sediment, which would dewater the creek and disrupt the aquatic life in the stream. The culvert and stream relocation calls itself a Habitat Improvement Project as part of development of a utility facility. Instead of enhancing fish and wildlife habitat, it would disrupt existing ecosystem functions and create an unnatural bermed stream in the middle of wetland A, in the process cutting many mature trees. The application states the channel would be regraded to assist in sediment transport. This project occurs at an abrupt transition in stream grade, from steep to shallow. The proposed stream relocation would extend the steeper section beyond the project development, facilitating sediment transport through the PSE site and allowing deposition of sediment to occur downstream, impacting downstream parcels. The wetland and stream relocation would remove 43 mature alder trees with an average diameter over 10 inches and a maximum diameter of 18 inches. 22 poplar trees are proposed to be removed which are mostly clustered adjacent to the stream. Proposed mitigation for removal of 65 mature wetland trees is just 66 small two-gallon wetland trees, along with hundreds of shrubs and groundcover. In addition the project is planting 48 upland/buffer trees (2 gallon) in what was formerly wetland. Project is converting a forested wetland into a shrub dominated wetland bisected by upland berms. While there will be a net increase in the number of trees in the wetland/stream system, assuming all newly planted trees survive, the tree canopy will be greatly reduced for decades.	Comments noted. The approvals listed are not under the jurisdiction of the City. However, PSE has been working with WDFW and Tribes to facilitate the stream enhancement project and remove instream flow restrictions that have resulted from the existing undersized culverts. PSE is seeking a Section 404 Permit for the Richards Creek Substation site. PSE must obtain all required and necessary permits from the appropriate agencies. The permits required by Bellevue will be obtained from Bellevue. The stream realignment allows for the creation of more complex and higher quality riparian wetlands and buffers of substantial width along both sides of the stream, whereas the existing alignment is straight, borders a paved area, and is largely lined with reed canarygrass and nightshade. Additionally, new native plantings will provide increased soil stability and native vegetation that could potentially reduce velocity of peak flows; thereby improving wetland and stream buffer functions, along with increased channel dimensions and flow-carrying capacity. The proposed replacement culvert for the access route crossing will meet current design standards for fish passage (WDFW 2013), provide flow conveyance for up to the 100-year peak flow rate, and facilitate sediment management. The replacement culvert will contain a sediment trap beneath the access route with a road-accessible cleanout. This will provide relatively easy, low-impact removal of built up sediments. Stream, wetland, and buffer areas will be enhanced with new native plantings, which will provide a net increase in species and structural diversity. Culvert replacement and stream restoration will result in net habitat benefits following Project implementation. It will improve fish passage, and improve in-stream and riparian habitat conditions. Additionally, temporary impact areas will be restored. New plantings will provide organic matter and foraging and nesting opportunities for terrestrial wildlife, including several songbird species. Mitigation is designed to meet or exceed Ecology recommendations. Improving the stream channel will result in increased channel dimensions and flow-carrying capacity. Use of the sediment trap will facilitate and improve sedimentation management. Including snags and large woody debris in mitigation plans will help to address the loss of forested habitat values in the short-term, and over time the loss of function would be further addressed as mitigation areas mature. While the vegetation structure within the Project area will be altered, a net increase in native habitat area is expected in the long-term with mitigation.
107	4/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**<u>Forest Canopy losses - Richards Creek 230 kV Substation:</u>** Besides the removal of 65 mature wetland trees as part of stream relocation, this project is proposing to remove 205 mature trees for project development, and the cutting (topping at 15' height) of 46 trees as part of a vegetation management area. The 205 trees removed include two 30" diameter maple trees and a 34" diameter fir tree. The 46 trees topped include 48" diameter and 30" diameter maple trees. There is no mitigation proposed to mitigate these impacts as part of the Richard Creek 230kV Substation project. This project fails to maintain existing tree canopy coverage, let alone meet targets.	Mitigation of tree removal will be part of the project. Vegetation Management at this location is for the reliability of a 230 kV substation and not related to the power line phase of the project.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					There is no justification to top 46 mature trees in the vegetation management area. This area is not under any new or existing power lines.	
108	5/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**Conceptual photo simulations:** The conceptual photos do not represent the project as applied for in the plan sheets. Conceptual 30 shows 75' poles, plans show 85' to 100'. Conceptual 38 shows 65' poles, plans show 70' to 80'. Conceptual 39 shows 75' poles, plans show 72' to 82'. Conceptual 40 shows 75' poles, plans show 76' to 95'. Conceptual 18 shows 80' poles, plans show 82' to 90'. Conceptual 15 shows 80' poles, plans show 82' to 90'.	The pole heights on the photo simulations are approximations. Additionally, the plan height referenced in the comments are for total pole length, not the above ground height.
109	6/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**New Monopoles comments:** The direct embed installations require site-specific geotechnical studies. The foundation-style installations require engineered design drawings. The foundation designs must be analyzed for seismic stability. These new monopoles are proposed to be eighty to one hundred twenty-five feet tall, carrying multiple high-voltage lines under tension, which could land directly on residential houses and a middle school if the foundations should fail. Please provide a profile view of the underground portion of each pole, in relation to the pipeline depth. Would foundations be deeper than the adjacent pipeline depth? How close to the pipeline both vertically and horizontally would these pole installations occur? The Construction Scenarios presented in Appendix B of the plans do not have any scale. How wide would the access road be? Residents must be consulted to agree on the actual access route through backyards. What mitigation is proposed for tree and shrub removal on resident's land? Installing a two-gallon tree to replace a full grown tree does not mitigate the long-term loss of shade, visual buffer, and noise reduction benefits we currently enjoy, let alone the fact that our pre-school child planted it so many years ago. The project should provide professional appraisal of all vegetation proposed to be disturbed and pay that cost to the land owner. The Citizens Advisory groups have not been consulted on the choice of pole finish. This is an important consideration, both for the overall character of the neighborhood, and for residents who will have to look at individual	PSE design meets the appropriate NESC design requirements. Property owner vegetation replacement will be addressed on a property-by-property basis. PSE has made considerable efforts to meet with property owners. If property owners are interested, they can contact PSE. It is expected that in most instances, the poles would be installed at a depth that would be greater than the depth of the Olympic pipeline(s). Profile views could be provided as part of the Clear and Grade permit application. Temporary access roads will be developed as necessary to meet construction requirements. PSE will operate within its existing property rights for access. Coordination with residents will be made throughout the corridor and project duration. Pole finish will be suggested by PSE; however, the permitting jurisdictions will have input into the final decision.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					poles intruding on their view outside their windows.	
110	7/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**Plan sheet comments:** The plan sheets show only one existing pole location where existing pole structures are H-poles. Revise the sheets to show actual existing pole locations. Sheet 5/25 shows a three new high tension lines over I-90, with three new poles and a new line headed east extending off the plan sheet. This new line is not part of the project proposal.	There are no new transmission lines over I-90. Two of the existing lines will be upgraded from 115 kV to 230 kV. One additional shield wire will be added to the system.
111	8/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**Overall project comments:** The project application is incomplete. There is inadequate analysis of project effects, including wetland impacts, stream impacts, stormwater management, and tree canopy targets. There is no wetland mitigation plan, no final culvert design, and no long-term stormwater management plan. The project does not have required state and federal permits, including Section 404 permit, Section 401 Water Quality Certification, and Hydraulic Project Approval. The design for pole foundations is completely lacking. While it is acceptable to phase construction, the project must be permitted as a whole and complete project. The project as applied for does not have independent utility.	The project application was determined complete by the City. PSE will be apply for and obtain the necessary permits for the project. If additional information is required for foundation design, it will be provided as part of the Clear and Grade permit application. For linear projects, such as utility lines, it is common and typically, required to permit the project by jurisdiction. PSE's application follows appropriate state and city regulations.
112	9/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**South Bellevue Critical Areas Report Puget Sound Energy – Energize Eastside Report, the Watershed Company August 2017:** Page 17 – 18 discusses salmon in South Bellevue streams and notes lamphrey use only. This is inconsistent with the Watershed Company Report 2008 Spawner Survey Report which found Chinook salmon, Coho Salmon, and Cutthroat Trout use in Richards Creek and Coal Creek. Further the tributary that the Richards Road 230 kV substation is located on goes to Richards Creek. Richards Creek has Clean Water Act category 5 303(d) listing #70091 for bioassessment; this requires improved water quality conditions and the proposed stream reconfiguration proposed under the Energize project will likely act to reduce water quality.	Coho salmon and river lamprey are noted as being in Coal Creek on page 22 of the Critical Areas Report. Chinook salmon are not discussed in the Critical Areas Report, but rather in the Project's Endangered Species Act (ESA) document as stated in the Critical Areas Report, page 17. While cutthroat trout are not considered a species of importance by the City of Bellevue, use of Richards Creek by cutthroat trout is noted in the Critical Areas Report, pages 8 and 50. Per page 49 of the Critical Areas Report: Wider and more fully vegetated buffers along both sides of the stream will increase their capacity to provide biofiltration function. This will help to improve water quality from stormwater originating off-site upstream as well as helping to filter storm water originating onsite prior to it reaching the stream onsite. Furthermore, preventing flows from spilling out onto a lower, paved industrial area adjoining to the west during high-flow events (and even from pervasive seepage) will reduce the entrainment of pollutants from this pollution-generating surface. This will result in overall improvements in water quality. While the stream is listed for impairment of biological integrity (i.e., benthic, macroinvertebrates), there could be many causes for such a listing including unknown pollutant(s) habitat issues, fine sedimentation, etc. As the project will result in overall improvements to water quality, habitat, and sedimentation, further impairment of the stream for biological integrity is not anticipated.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
113	10/10	Nolan, Joan & Robert	4700 133rd Avenue SE, Bellevue, WA 98006	8-Mar-18	**Alternative Siting Analysis – Questions:** PSE states that the proposed Energize corridor was chosen after extensive study. How can this be when PSE has still not produced any evidence that it has considered EIS comments from at least 2016 onwards? Why has PSE chosen a residential corridor rather than an industrial corridor for Energize? What will PSE do to mitigate the negative impact to the City of Bellevue view corridors?	PSE initiated a Community Advisor Group that met a multitude of times to assess and recommend corridors. Additionally, there are only limited areas zoned as Industrial through the City. PSE chose the existing corridor as it is one of only a few north-south existing utility corridors; placing the new lines in the existing 115 kV corridor limits impacts.
114	1/1	Picatti, William	5245 Highland Drive, Bellevue, WA 98006	14-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because the data that PSE has provided is faulty in oh so many ways. The use of winter-time load factors combined with summer-time derating factors is but one example. Combine the use of faulty information with the lack of acceptance of updated usage / demand numbers and new technologies, and this request doesn't make sense. This proposed project is way too expensive and potentially hazardous to the environment and the people that live near the proposed new line. Please, do not support the PSE proposal for this new, dangerous transmission line!	Please see the attached Comment Response Summary.
115	1/1	Rossi, Ralph A.	5933 149th Ave SE, Bellevue, WA 98006	13-Mar-18	I would like to be a party of record, opposing PSE's planned power line expansion in Bellevue.	Comment is addressed to the City.
116	1/1	Saw, Chit	13809 SE 51st Place, Bellevue, WA 98006	11-Mar-18	As a concerned citizen of Bellevue, I am writing to ask that the city NOT approve PSE's permit application to build high-voltage transmission lines for its Energize Eastside project that will cut through our neighborhoods and schools, and gravely endanger us all. As has already been argued countless times in public meetings on this issue, this project is unnecessary and a waste of ratepayer funds. It was undertaken primarily for the purposes of generating a financial return for the utility's investors. Furthermore, it is risky to install tall power poles within feet of two half-century-old petroleum pipelines. A section of PSE's preferred alignment for the new poles will cut right through Tyee Middle School, which my child attends. Why would the city government, which is supposed to represent the interests of its citizens, even consider putting staff and students at risk for a project which brings little benefit to the community? Not to mention the damage that this blight on the landscape will bring to our communities and the environment by removing thousands of valuable urban trees. After all, aren't we supposed to be a "City in a Park"? There are far less costly ways to enhance the reliability and resiliency of the Eastside power grid. I would urge you to take the concerns of Bellevue citizens seriously and accordingly reject PSE's Energize Eastside permit application. Let's all work together to find real solutions that are more in	Please see the attached Comment Response Summary.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					line with our values as a city.	
117	1/1	Scott, David & Sherron	4539 Somerset Dr. SE, Bellevue, WA 98006	10-Mar-18	4539 Somerset Dr.S.E.Bellevue Wa. 98006 The above address, our home is situated in close proximity to the gas pipeline on the west and downhill side of the line. We have strong concerns relative to the safety in regards to any intrusion of the environment adjacent to the existing lines by the addition of the proposed power transmission lines.	Please see the attached Comment Response Summary and Section 4.9 of the FEIS.
118	1/1	Stronk, Sue	12917 SE 86th Pl, Newcastle, WA 98056	12-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary and EIS.
119	1/1	Suurs, Mindy	4662 144th Pl SE, Bellevue, WA 98006	8-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Why would such a progressive, tech-oriented area (Eastside) use anything less than the newest, best, most environmentally friendly utilities? Why spend so much money and end up with an outdated eyesore result? Do NOT let the profit motive of this corporation (PSE) dictate this backward-thinking plan. There is no excuse – you can't say you didn't know better because PSE has turned a blind eye toward all the evidence from CENSE and others and wants to plow forward recklessly with their predetermined plan. Please notify me when any Bellevue public hearing for this project is announced.	Please see the Comment Response Summary.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
120	1/1	Tien, Patrick	4711 135th Pl SE Bellevue, WA 98006-3034	9-Mar-18	Please put me/my feedback in the party of records for PSE/EE application; Name: Pen-ho Patrick Tien Address: 4711 135th PL SE Bellevue, WA 98006-3034 Here are my comments: 1. The PSE project impacts on our property and make the whole area industrial looking. 2. I have a big concern about safety during construction around pipelines. 3. There is no insufficient proven need for this project.	Please see the attached Comment Response Summary and EIS.
121	1/1	Ting, Rachel	13314 SE 44th Pl, Bellevue, WA 98006	7-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary and EIS.
122	1/1	Tong, Loan	13308 SE 44th Pl, Bellevue, WA 98006	7-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary and EIS.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
123	1/1	Turner, Ingrid	12512 SE 52nd St., Bellevue, WA 98006	13-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary and EIS.
124	1/1	Weir, Kristina H.	4639 133rd Ave SE, Bellevue WA 98006	15-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. PSE has not provided evidence that we actually need this big increase in energy capacity. Demand has been relatively stable despite increases in population and jobs. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. 3. It damages communities and the environment by removing thousands of valuable urban trees. Also PSE relies on fossil based fuels for 60% of its energy production which adds to GHG's. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. PSE has admitted it project will not increase reliability. Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary and EIS.
125	1/1	Wilson, Jennifer	14312 SE 45th Street, Bellevue, WA 98006	6-Mar-18	I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because: 1. It is unnecessary and wasteful of ratepayer funds. 2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines, especially in such close proximity to schools, daycare facilities, and homes. 3. It damages communities and the environment by removing thousands of valuable urban trees. 4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Bellevue can and should join the 21st century on this! Please notify me when any Bellevue public hearing for this project is announced.	Please see the attached Comment Response Summary and EIS.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
126	1/1	Aramburu, Rick	Aramburu & Eustis, LLP 720 Third Avenue, SUITE 2000 Seattle, WA 98104	9-Mar-18	See attachment: 2018-3-9 Bellevue-permit bifurcation.pdf for full details of comments to be addressed.	PSE's application is compliant with state and city regulations.
127	1/1	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	18-Nov-17	See attachment: Energize Eastside Permit Questions 11-18-2017.pdf *This is a shorter version of Mr. Borgmann's pdf submitted on March 10, 2018.	Thank you for these comments, which are posted and answered elsewhere in this document.
128	1/3	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	18-Nov-17	PSE clearly stated they care about two things: SAFETY and RELIABILITY. Keri Pravitz reiterated that to me personally during the "Open House" at the end of the meeting. However, those claims ring hollow. The existing power corridor was sublet to the Olympic Pipeline - not visa versa. The power lines were installed first, THEN the pipeline. That order of construction is important. Now PSE wants to go in and dig around aging pipelines to install new poles for a power line to carry 4X more power. This is a recipe for DISASTER. PSE has an abysmal safety record with gas pipelines (despite their claims to the contrary). Remember the Greenwood neighborhood explosion? And those are PSE natural gas pipelines that they own and presumably know where they are located. PSE is not the owner of the Olympic Pipeline. PSE doesn't know the nuances of how the pipelines were installed, and how they operate. There is more than one pipeline. And those are BIG pipelines (16" diameter and 20" diameter) with JET FUEL flowing at 700 PSI. Jet fuel is much more highly volatile than natural gas. We are being asked to trust PSE? How can the City take PSE's safety claims seriously? The evidence overwhelmingly outweighs PSE flimsy safety claims. The City is exposing themselves to serious liability by even contemplating allowing PSE to install power lines on top of the pipelines. Power lines were installed first, THEN pipelines. Not the other way around. The order of construction mattered 50 years ago, and it matters today.	Comments are addressed to the City. PSE is aware of the pipelines in the corridor and works with Olympic to coordinate work within the corridor. Notably, dozens of poles have been replaced in the corridor over the past decade.
129	2/3	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	18-Nov-17	PSE also spoke about RELIABILITY. "We have to keep the lights on." FACT: Energize Eastside will not affect reliability. PSE's own representatives (Andy Swayne) is on record stating that fact. Energize Eastside will neither decrease the frequency of outages nor the duration of outages. I urge the City to ask PSE to quantify exactly how much reliability will be improved as a result of Energize Eastside. They City owes the public that answer. I've asked. PSE's answer: ZERO increase in reliability. Yet this project will cost ratepayers over $1BILLION dollars over the next 40 years?! "Keeping the lights on" is a blatant scare tactic. It frightens residents. It threatens businesses by implying they will not be able to grow. It intimidates City Government by leading them to believe they won't be able to continue	PSE is not in agreement with assumption supporting these opinions. Understanding system reliability, other forms of outages (storms) and the difference between energy usage and demand are matters encompassed in the electrical business undertaken by PSE and we are confident in the work of our employees to plan for and ensure reliability at all times. At the request of the public, the City of Bellevue did hire a third party expert Utility System Efficiencies (USE) in system planning, who confirmed the need for the project.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
					business development efforts. BUT IT SERIOUSLY MISREPRESENTS AND DISTORTS THE FACTS. Despite robust growth (population and economic), electricity demand is DECLINING due to more energy efficient construction techniques, building materials, micro-generation, conservation - to name a few. Here is an example: While it seems counterintuitive at first look, despite the BOOMING economy and growth in the region (population and economy), ELECTRICITY DEMAND is flat to declining in the region. Here's one of the many reasons why: https://blog.aboutamazon.com/sustainability/the-super-efficient-heat-source-hidden-below-amazons-new-headquarters It's not just Amazon's high rises that are following these principles. Virtually every major building project on the Eastside and in Seattle are incorporating significant energy efficiencies. The fact that the City helps facilitate this fraudulent misrepresentation of the facts makes the City complicit in PSE's fraud - again exposing the City to significant liability. I urge the City to stick to the facts. I urge the City to hire independent experts to validate all claims by PSE - as recommended by EXPONENT in their 2012 report on Bellevue's electrical reliability.	

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
130	3/3	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	18-Nov-17	PSE is maintaining their 3-prong media campaign to scare residents, businesses, and City Government: 1. Eastside Growth is straining the local grid 2. The "backbone" hasn't been upgraded in over 50 years 3. If we don't act soon, we will face rolling blackouts PSE said during they meeting that they would have to begin implementing even more complex Correction Action Plans (CAPs) to keep the lights on. That certainly implies that PSE has already had to resort to CAPs because the situation is so dire. I urge the City to ask PSE exactly how many CAPs they have had to institute in the last 6 years? Dozen years? Please report that information publically. PSE has employed ZERO CAPs to-date. FACT: Bonneville Power Administration has an automated system (installed and in-use since 2007) that will prevent rolling blackouts. BPA controls this - not PSE. BPA has stated that the lights will stay on - contrary to PSE's scare tactics. Our region's electrical grid is exactly that - A GRID. There is no longer a "backbone". Our region's transmission system resembles more of a "mesh" or a "network" not a single centralized line subject to damage by storms or natural disasters. And that transmission GRID has been upgraded multiple times in the past 20 years, including recent upgrades in 2009. It is completely false when PSE says they haven't upgraded the transmission system in 50 years. PSE is required, at a minimum, to review and analyze their system every 2 years via the Integrated Resource Planning (IRP) process. PSE makes routine transmission upgrades and improvements. If they did not, they would be delinquent in their regulated duty to provide reliable electricity to its customers. "The backbone hasn't been upgraded in over 50 years" is a good sound bite, but a false argument. Since the City hosted this meeting and heard PSE make that claim, the City has the responsibility to set the record straight. The City owes the public the truth on this point. Please show a map indicating all of the transmission upgrades that PSE has made on the Eastside in the last 20 years. If you don't have the data, I am happy to supply it. Finally, we have all seen the Andy Wappler PSE ads stating that "If we don't act soon, we will face rolling blackouts". The City owes the public the facts on CAPs that PSE has had to implement. The City owes the public the facts on the reliability increases we might expect from Energize Eastside. The City owes the public the facts on how much this project will REALLY cost customers in the form of higher electricity rates. What are we really getting for $1BILLION dollars? A relic of a bygone era. There are better alternatives. Less expensive alternatives. More safe alternatives. More reliable alternatives.	Corrective Action Plans (CAPs) are operating procedures utilized by operators to help keep the lights on. CAPs are used in real-time (*i.e.,* operations). PSE planning is based on forecasts of which could happen in the future, so the measures can be planned out and taken to avoid such events. The planning requirements are rigorous and do not allow utilities to count on temporary operational measures that may be called on in emergencies. When PSE plans to rigorous performance criteria, then operators in real-time will have options that can keep the lights on, even if the actual real-time operating conditions differ from the studied conditions. By law, the company cannot, and does not, wait for real-time operational problems before it decides to plan a solution.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
131	1/1	Borgmann, Russell	2100 120th Pl SE, Bellevue, WA 98005	18-Nov-17	Please add these comments to the Energize Eastside Permit Public Comments. Please confirm receipt of these comments. **Tree Canopy: QUALITY and QUANTITY** PSE has stated that their goal is to have MORE trees, not less, once their project is complete. However, tree canopy is not solely a question of quantity, but also QUALITY. According to Professor Timothy Fahey (Cornell University) a mature tree canopy (50 years) can sequester 30,000 lbs of carbon dioxide per acre and emit about 22,000 lbs of oxygen. According to the EIS, Energize Eastside will denude the equivalent of 327 acres. Destroying over 300 acres of mature native vegetation could result in escalating carbon dioxide levels by at least 9 MILLION pounds. How much is that? That is the equivalent of burning an additional 450,000 gallons of gasoline. With vehicles averaging approximately 25 miles/gallon, that's the equivalent of driving an additional 11 million miles, or adding approximately 900,000 vehicles per year to Puget Sound region highways. It will take MANY, MANY years for young vegetation and saplings to make up for the loss of mature tree canopy. In the meantime, the region's pollution and greenhouse gas emissions will escalate. <u>Tree canopy is about the QUALITY and QUANTITY of mature vegetation.</u> How will the City of Bellevue respond to criticism about escalating pollution and greenhouse gas emissions as the result of Energize Eastside? Energize Eastside is a triple whammy: 1. it increases greenhouse gas emissions by stripping the region of mature vegetation so less carbon emissions are sequestered 2. Young saplings will not generate and emit nearly as much oxygen, until they mature - requiring SEVERAL DECADES 3. Energize Eastside transmission lines will generate corona, which is proven to attract airborne particles, thereby further increasing pollution in the region How will the City of Bellevue respond to failure to adhere to Low Impact Development (LID) Principles enacted by the City of Bellevue, specifically related to mature tree canopy? LID is about more than storm water management.	Response to #1 and #2: Please see the Air discussions in Section 4.5 of the Final Environmental Impact Statement (FEIS). Response to #3: PSE is not aware of corona-causing air pollution. Response to LID question: PSE will comply with the City's requirements for "hard surfaces" and "impervious surfaces" per Chapter 20.20 of the Bellevue Land Use Code. This will be detailed as part of the Project's Clearing and Grading Permit process. Proposed landscaping and re-vegetation will be done in compliance with Section 20.25A of the Bellevue Land Use Code.
132	1/1	Cox, Sean	4538 Somerset Dr. SE Bellevue, WA 98006	16-Nov-17	Please address how PSE can apply for permits when they haven't addressed any of the safety and risks identified by residents. They have not followed the process outlined in the states requirements for infrastructure projects and the City of Bellevue has not required them to follow the process. Until all the designs, risks, and safety issues have been addressed all permits should be denied. You can see the risks and safety items that I have submitted as part of the EIS process.	PSE has followed the appropriate processes in developing and preparing permit application materials for Energize Eastside. The comment is noted; however, no specifics are provided regarding what parts of the design, risks and safety issues were not addressed during the EIS process and the permit application process.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
133	1/1	Esayian, Karen and Sam	4601 135th Ave SE, Bellevue, WA 98006	16-Nov-17	Good morning Heidi, My question and concern is about the Energize Eastside proposal and permit application by PSE. Specifically: commenting on the Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO During the comment periods for Phase l and Phase ll of the EIS we were assured that our comments would all be included and reviewed in the FEIS. Now that we are in a 'comment period' for the EE application there is confusion as to whether the comments made by Eastside residents in Phase l and Phase ll will definitely be carried over and included in the current comment period. Or.....must all residents who wish to be a party of record once again submit comments, names and addresses to be included in this process? (These questions were not fully addressed on the City's webpages, see below) My notes are incomplete from the 11/14 meeting as to suggested comment topics. Could you outline them? Thank you for your work on behalf of Bellevue residents. Please include an email address for submitting additional comments.	Questions and comments are addressed to the City.
134	1/1	Fletcher, Sarah		3-Dec-17	Good morning, as there is no mention of how much of Eastside's electricity would be needed to run Sound Transit's East Link Light Rail, is that because Sound Transit's East Link will not be needing electricity from this Richards Creek Substation? And you or someone at Puget Sound Energy might know, Where is Sound Transit's East Link light rail electricity to run it coming from? And if the electricity from Richards Creek Substation is needed, how much of it will be used for light rail and how much to run the electricity in people's homes /businesses? Perhaps, you could come out with a chart to compare the Light Rail energy use to how many houses equivalent use that works out to a day/week? "PSE proposes to construct a new Richards Creek Substation in Bellevue and upgrade 18 miles of two existing 115-kilovolt transmission lines with 230-kilovolt lines. Collectively this proposal, which spans from Renton to Redmond, is referred to as Energize Eastside."	The Sound Transit East Link Light Rail will obtain power from both PSE and SCL. Expected loads from the East Link project have already been accounted for in PSE's load studies.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
135	1/1	Harris, Brit		26-Nov-17	Please do not allow PSE to put high voltage power lines near Tyee Middle school. As an engineer myself, I know there are always going to be safety risks by placing them next to fuel lines. There are no measure that can eliminate all safety risks. According to the National Cancer Institute (https://www.cancer.gov/about-cancer/causes-prevention/risk/radiation/electromagnetic-fields-fact-sheet) the interpretation of the finding of increased childhood leukemia risk among children with the highest exposures (at least 0.3 μT) is unclear. Several studies have analyzed the combined data from multiple studies of power line exposure have found an increase in childhood leukemia(details are listed in the above link). Extremely low frequency EMFs (ELF-EMFs). Sources of ELF-EMFs include power lines, electrical wiring, and electrical appliances such as shavers, hair dryers, and electric blankets. In 2002, the International Agency for Research on Cancer (IARC), a component of the World Health Organization, appointed an expert Working Group to review all available evidence on static and extremely low frequency electric and magnetic fields (12). The Working Group classified ELF-EMFs as “possibly carcinogenic to humans,” based on limited evidence from human studies in relation to childhood leukemia. In 2015, the European Commission Scientific Committee on Emerging and Newly Identified Health Risks reviewed electromagnetic fieldsExit Disclaimer in general, as well as cell phones in particular. It found that, overall, epidemiologic studies of extremely low frequency fields show an increased risk of childhood leukemia with estimated daily average exposures above 0.3 to 0.4 μT, Until further studies can eliminate this as a risk, we should assume that this is still a high possibility. Please do not expose the children to these power lines for long periods of time! Thank you for your support!	The FEIS states: "As discussed in the Phase 1 Draft EIS, there are no known health effects from power frequency EMF at the levels expected from the No Action Alternative or PSE's Proposed Alignment." (Section 4.8.5.1) Please see the provided Comment Response Summary and Section 4.8 of the FEIS for more information.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
136	1/1	Judkins, Kathy	4324-136th Pl SE, Bellevue, WA 98006-2237	14-Nov-17	Heidi I will be at the meeting tonight. I wish to be a party of against this permit for the EE project. I have two poles in my yard at 4324-136th Pl SE Bellevue, WA 98006. The proposed Permit states the new pole will be 80 feet tall with 230kwh lines. This will be an extreme danger to my home in the event of an earthquake or other natural disaster. The pole with that height will fall on my home or my neighbor Kelly Xu's home. We also have the Olympic Pipeline in close proximity to this pole. Also the only access to my home is on the easement drive. I am a 71 year old widow and need access to my driveway. No written details have been mailed to me by Energize the Eastside other than this October 19 Permit Bulletin. I have refused to meet alone with EE people. I asked to have a meeting with my neighbors on the easement and PSE/EE project people but that request was not given. Please list me as a party of record as being against this record. No permit should be issued, I believe that batteries are the answer. Thank you Kathy Judkins CENSE member Former Somerset Community Association President for 3 years Somerset resident since 1983 4324-136th Pl SE Bellevue, WA 98006-2237	Please see the attached Comment Response Summary. Additionally, PSE has reached out to – and continues to reach out to - property owners along the corridor to discuss and clarify revegetation and access plans.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
137	1/1	Walter, Karen	39015 172nd Ave SE, Auburn, WA 98092	17-Nov-17	Heidi, Thank you again for sending us the link to documents associated with the Eastside Energize Project for the Bellevue portion. We have reviewed the available information and offer additional comments to those we have already provided: With respect to the CAR and mitigation plan (our last comment in the email below), it is noted that the plan is preliminary and incomplete. We request an opportunity to review the final mitigation plan before it is approved. For what mitigation is proposed, there is no consideration regarding impacts to future wood recruitment, a key riparian function. The mitigation plan should include details regarding the size, location, and species of trees to be permanently removed within 200 feet of all streams and wetlands. The native trees that are least 4 inches in diameter and within 200 feet of streams should be placed back into the affected streams to create fish habitat. The project should also mitigate for the permanent loss of native tree growth for trees that grow taller than 15 feet naturally and where the ROW overlaps with these 200 foot zones. Since the applicant cannot do so in the corridor, the applicant should be mitigating for this particular impact offsite. Again, we appreciate the opportunity to comment and ask that Bellevue/applicant provided written responses to all comments we have sent to date. Best regards, Karen Walter Watersheds and Land Use Team Leader	Thank you for the comment; we will provide these materials to the Muckleshoot Indian Tribe along with other Section 404 materials concurrent with submittal to the U.S. Army Corps of Engineers.
138	1/1	Smith, Grace	201 S. Jackson St., Seattle, WA 98104-3855	2-Nov-17	Attached, please find King County Wastewater Treatment Division's comments on the Notice of Application for Energize Eastside in Bellevue, WA (17-120556-LB/17-120557-LO). Thank you for the opportunity to review and comment on this project.	No attachment was provided.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
139	1/1	Nolan, Joan		15-Nov-17	Hi Heidi, Unfortunately I was unable to attend last night's meeting on Conditional Use Permit (File # 17-120556-LB) Critical Areas Land Use Permit (File # 17-120557-LO) and ask any questions. So if you would, please get back to me on the following questions: *Are the permit application materials final? *Will new or revised information be submitted? *For last night's presentation on PSE's Energize Eastside Permitting Overview slide 4 Process Overview the timeline does not provide dates. Can you provide these? I'll look forward to hearing back from you on these items, hopefully soon. Thank you for your assistance.	Questions are addressed to the City.
140	1/1	Lauckhart, Richard	44475 Clubhouse Dr, Davis, CA 95618	11-Dec-17	*Mr. Lauckhart has 17 attachments with embedded comments/questions.	Many of these comments were provided during the Phase 2 DEIS comment period and were responded to in the FEIS. See Appendix K, starting on page K-141. Operationally, there are always power flows across the Northern Intertie. Typically, the power flows from north to south during the summer and south to north in the winter. However, as stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "The Optional Technical Analysis examined this issue by reducing the Northern Intertie flow to zero (no transfers to Canada). Although this scenario is not actually possible due to extant treaties, it was modeled to provide data on the drivers for the EE project, to examine if regional requirements might be driving the need. The results showed that in winter 2017/18, even with the Northern Intertie adjusted to zero flow, the Talbot Hill 230/115 kV transformer #2 would still be overloaded by several contingencies (several different outage scenarios). Again, the projected overloads indicate a project need at the local level to meet reliability regulations." Whether or not generation was turned on is specific to operational parameters and not federal planning standards. Federal planning standards are used to determine the need for the Energize Eastside project. In addition, as stated in the report prepared for Bellevue by Utility Systems Efficiencies, Inc. (2015): "Several hypothetical scenarios were studied as part of the Optional Technical Analysis (OTA). Each one showed overloads in the 2017/18 timeframe, indicating project need in order for PSE to meet federal regulatory requirements for system reliability. The OTA results showed that reducing the Eastside area growth from 2.4% to 1.5% per year in the period from winter 2013/14 to winter 2017/18 still resulted in project need. Reducing PSE's King County growth while keeping the Eastside growth the same similarly resulted in a project need. Turning on additional generation in the Puget Sound area also resulted in a project need." Therefore, area generation being turned on or off does not change the need for Energize Eastside. PSE disagrees with the commenter's conclusions about the continued viability of the existing system to age 100 without improvements. Electric system planning is a complex and rigorous exercise, performed by industry experts with the experience in and understanding of federally mandated system planning requirements. The need for this project has been firmly established several times by multiple independent experts, and is not the conclusion of PSE alone. It is not known what the quality of technical rigor or expert oversite are used to validate Mr. Lauckhart's findings or assumptions.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
141	1/1	Marsh, Don		24-Aug-18	1) What were actual summer and winter peak demand levels for the Eastside for 2008-2017? Since peak demand is highly correlated to temperature, this 10-year date range will help us understand the growth trend, the influence of weather, and the relative magnitude of summer and winter peaks. 2) PSE assumes regional transfers of 1,500 MW in winter and 2,850 MW in summer. What portion of these transfers are firm commitments by PSE or BPA that cannot be curtailed during an N-1-1 outage emergency affecting the Eastside?	1) PSE does not track specific subsets of peak demand levels across the system. The actual normalized peak demand level that was used to assess transmission system deficiencies was exceeded during the summer of 2017; therefore, the information requested related to relative magnitude of peaks is not relevant. 2) NERC TPL standards require that firm commitments be included in the planning studies; therefore, the questions is not relevant to the application nor the project need.
142	1/3	Marsh, Don		28-Aug-18	The City asked PSE for hourly records of Eastside demand for the summer of 2017. However, the applicant is required by LUC 20.20.255 to provide the following: 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; Information describing both summer and winter peaks is critical to assessing whether customer and system reliability is improved by the project. The FEIS at page 1-3 states the need for proposal is the "risk of power outages that typically occur in cold or hot weather as early as the summer of 2018." Accordingly, PSE must provide hourly records for summer and winter peaks for 2008-2017 so decision makers can assess demand trends during the past decade. The FEIS at page 1-5 says that there is "potential for load shedding (forced power outages) by summer of 2018." Data for peak loads during the summer of 2018 should be provided since the peak warm period for the summer of 2018 has now passed. Since the replacement of the Lakeside substation is also part of the project, PSE should specify the power flowing through the Lakeside substation for the periods in question. (This expands the request in our first letter.)	b and c) PSE has addressed these topics in Section 3.0 of the Alternatives Siting Analysis, which was submitted as part of the CUP application. The CUP decision criteria do not require the City to assess demand trends that may be reflected in hour by hour data. The City's expert, USE, has independently verified the methodology, inputs and conclusions that support PSE's needs assessment. These assessments are not informed by hourly use data . As required by FERC/NERC, PSE currently has Corrective Action Plans or CAPs in place to address such peaks. Additionally, the commenter's statements related to the Lakeside substation are incorrect. The Lakeside substation is not being replaced as part of the Energize Eastside project.
143	2/3	Marsh, Don		28-Aug-18	BPA publishes records of electricity transferred between the U.S. and British Columbia over the Northern Intertie. These records show that large transfers happen occasionally. For example, on January 1, 2018, British Columbia transferred 2,244 MW to the U.S. On January 24, 2018, the U.S. transferred 1,974 MW to B.C. Under the code provisions above, PSE is obligated to describe how much of this electricity passed through the Talbot Hill, Lakeside and Sammamish transformers in each case (north and south transfers).	Bellevue hired USE to look at the issues raised by the commenter. The USE report states: "The Optional Technical Analysis examined this issue by reducing the Northern Intertie flow to zero (no transfers to Canada). Although this scenario is not actually possible due to extant treaties, it was modeled to provide data on the drivers for the EE project, to examine if regional requirements might be driving the need. The results showed that in winter 2017/18, even with the Northern Intertie adjusted to zero flow, the Talbot Hill 230/115 kV transformer #2 would still be overloaded by several contingencies (several different outage scenarios). Again, the projected overloads indicate a project need at the local level to meet reliability regulations." Additional discussion related to planning standards are provided in PSE's CUP application materials. PSE cannot provide operational loads for substations to the general public.

PSE Response to Public Comment

Line #	Multipart question?	Question/Comment Author	Address (If provided)	Date Submitted	Question/Comment	PSE Response
144	3/3	Marsh, Don		28-Aug-18	In the 2013 Eastside Needs Assessment, PSE/Quanta assumed that most local generation plants would be offline during an N-1-1 outage emergency. PSE has since admitted that this situation is unlikely to occur. Apparently, PSE ran a second load flow study with normal levels of local generation. PSE must describe details of this second study. Exactly how much were loads on the Talbot Hill and Sammamish transformers reduced when electricity from local generators was available?	PSE's planning method and planning process has been validated by FERC, USE (Commissioned by Bellevue), and during the EIS process by Stantec. Bellevue hired USE to look at the basis of the commenters question. The USE report states: "The Optional Technical Analysis examined this issue by reducing the Northern Intertie flow to zero (no transfers to Canada). Although this scenario is not actually possible due to extant treaties, it was modeled to provide data on the drivers for the EE project, to examine if regional requirements might be driving the need. The results showed that in winter 2017/18, even with the Northern Intertie adjusted to zero flow, the Talbot Hill 230/115 kV transformer #2 would still be overloaded by several contingencies (several different outage scenarios). Again, the projected overloads indicate a project need at the local level to meet reliability regulations."
145	1/1	Dahlquist, Mary & Maury	4944 127th Pl SE, Bellevue	6-Apr-18	How responsible are they (PSE) working with others? Who will be responsible? Will there be a response Plan in place for the worst case scenario if a gas leak, or explosion occurs?	PSE works with other utilities on a regular basis.