

From: [Don Marsh](#)
To: [Transmission Corridors Work Group](#)
Subject: Comments on Transmission Corridors Work Group Mtg #4 Pt 2
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Hello TCWG.

I reviewed the video of your Feb. 10 Work Group Meeting, and I had some observations that may provide further insights regarding PSE's "Energize Eastside" project and the permitting process. I lead the Coalition of Eastside Neighborhoods for Sensible Energy (CENSE), a well-informed group that has opposed the Energize Eastside project for nearly 8 years. Although PSE has done a lot of public outreach (skeptics may say, marketing and influence campaigns), our main concern is whether the project is actually **needed**. PSE and other speakers in the Work Group mentioned the unprecedented population and economic growth in the Eastside area, making a transmission upgrade an apparent "no-brainer." But the stated purpose of the project is to serve peak demand during an N-1-1 failure emergency. In 2015, PSE predicted peak demand would grow at a rate of 2.4% per year, roughly twice the rate of population growth. PSE's system-wide shows that peak demand has instead **fallen** during the past decade, as documented in PSE's 2021 Integrated Resource Plan.

PSE could easily prove the need for the project by showing actual historical peak demand data specific to the Eastside. But PSE has stubbornly refused to do so, claiming that information is restricted by CEII (Critical Energy Infrastructure Information). The company claims the data is so secret, it can't even be shared with professional experts or people who have obtained CEII clearance from FERC. In essence, PSE asks the residents who will be impacted by the project and all 1.2 million ratepayers who will pay for it to trust that PSE has correctly determined the need. We say, "Trust, but verify."

Since PSE insists only experts can access the data and understand the need for the project, we have requested that PSE take the project to EFSEC. We trust the experts at EFSEC have sufficient access and experience to verify that PSE has good data and analysis underpinning the project. Instead, PSE chose to pursue the much slower and complicated strategy of obtaining five land use permits. Unfortunately, the cities lack the staff and expertise to evaluate a project as complex as this one. In fact, the City of Newcastle has explicitly stated they cannot rule on the questions of need, safety, or alternatives because they don't have the staff resources. With the city refusing to recommend approval or rejection of PSE's land use permit, the outcome for that section of the power line depends on the ruling of a land use Hearing Examiner with no experience in transmission planning. PSE complains that multiple land use hearings give opponents the chance to appeal the same issues multiple times. This statement is incomplete. Each municipality has different land use codes that require separate consideration. For example, the Newcastle City Council passed an ordinance requiring a safe distance between PSE's new transmission poles and two 60-year-old petroleum pipelines that share the same narrow transmission corridor. No other Eastside city has an equivalent ordinance. The physical conditions are different in Newcastle, and the land use codes are different. Therefore, different issues may be appealed.

As you know, EFSEC could have granted a permit overriding local land use codes within one year. PSE's Lorna Luebbe said the company didn't think the project qualified for examination by EFSEC. *Really?* A project that runs through four cities isn't covered by EFSEC's charter? Sara Leverette said

PSE preferred to work with local interests rather than overriding the locals through EFSEC. If PSE really cares about local preferences, perhaps the company noticed that opponents submitting written and oral testimony in the Newcastle public hearing outnumbered supporters by a ratio of five-to-one.

PSE could have lessened the effectiveness of local opposition by being more responsive to data requests or by taking the case to EFSEC. Since PSE has refused to do either, the company is jeopardizing \$100 million and eight years of effort already expended on Energize Eastside. There are many lessons to be learned for the company and future infrastructure projects in our region. An eight-year debate is not in the best interest of anyone.

I hope this perspective is useful to your group as we all desire clean, safe, reliable, and affordable energy to serve our future needs.

I'm happy to answer any questions that might arise from my comments.

Best regards,

Don Marsh

President, CENSE.org