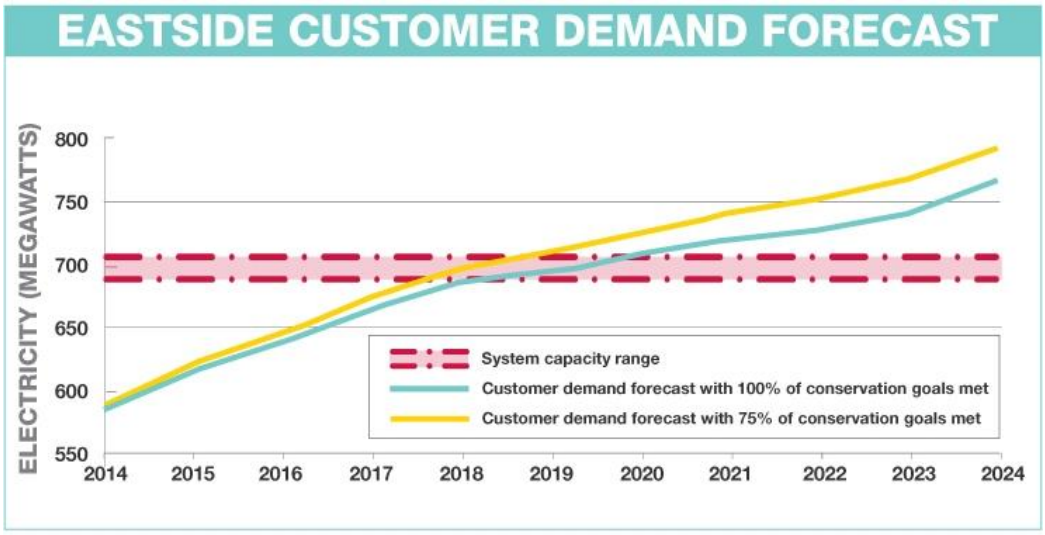
NEED/ALTERNATIVES

These pages are provided to assist you in commenting on the need for the project and alternatives. You can view the complete text at energizeeastsideeis.org. *Suggestion: go to Individual Phase 2 Draft EIS Files and click on the Chapter and specific Section you are interested in.*

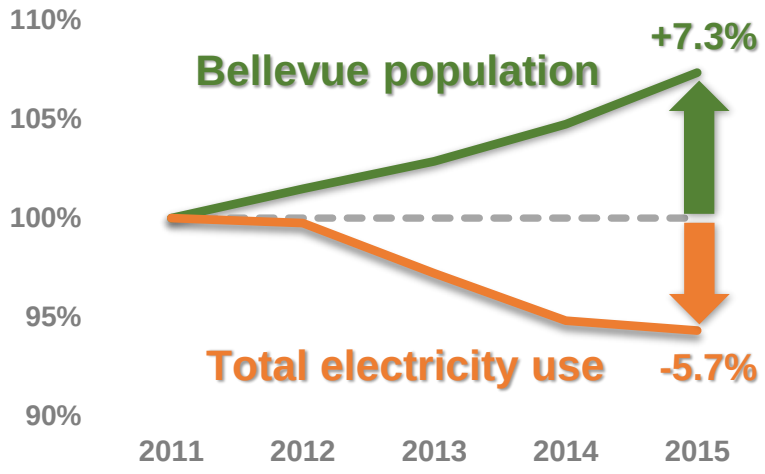
Chapter 1.1: Energize Eastside Project/1.3 Purpose and Need

The EIS says Energize Eastside is needed "to address a projected deficiency in transmission capacity resulting from growth in electrical demand which could affect the future reliability of electrical service for the Eastside." However, the EIS does not provide any numbers or charts to help the public understand exactly what the need is. In the past, PSE showed graphs like this one which appeared on the Energize Eastside website:



This graph has now disappeared from PSE's website. Although we don't know exactly why this graph has become so shy, we wonder if the actual values for 2014-2016 are decreasing (the numbers in this graph were forecasts). Is PSE trying to avoid embarrassing questions about the need for the project?

Here is a chart showing total electricity consumption for Bellevue, one of the Eastside's fastest growing cities. The data comes from PSE. Declining consumption doesn't support PSE's assumption that population growth is causing similar growth in the use of electricity. Energy efficiency and conservation are having a big impact:



The rate of growth shown in PSE's graph (2.4% per year, P1-5) is at least 6 times higher than demand growth expected by Seattle City Light, the electricity provider for customers who live in Seattle. Is Eastside consumption really growing 6 times faster than Seattle? These are some basic questions the EIS needs to answer.

Chapter 1.8: Alternatives Evaluated

A basic flaw in this EIS is the Alternatives are not fully defined. According to SEPA, WAC 197-11-440 (P2-2) "The No Action Alternative provides a benchmark against which the impacts of the project and other alternatives can be compared." Imprecise definition of the "No Action Alternative" diminishes its usefulness as a benchmark and prevents any meaningful cost effectiveness comparisons.

Chapter 2.1: Phase 2 Project Alternatives

The EIS accepts PSE's analysis dismissing viable Alternatives without question. PSE disqualifies these Alternatives using faulty analysis and outdated assumptions. Recent developments demonstrate how far behind the times PSE is behind.

Batteries

A Southern California utility was worried about rolling blackouts after an uncontrolled release from a methane storage facility. The risk was averted by a grid storage battery installed by Tesla in only three months. Could a similar battery address the Eastside's need for less cost, less risk, and less environmental damage?

If PSE is truly concerned about rolling blackouts by the summer of 2018 (P1-1), a quickly installed battery is a better solution. PSE says its proposed substation will take up to 18 months to build (P2-46). This cannot be operational by summer 2018. For this reason, Alternative 1A, the transmission line and substation, does not meet the need in the company's required time frame. It must be disqualified as a reasonable alternative.

Batteries are being used or considered in many other parts of the country. In a major recent development, the federal agency in charge of the Northwest regional grid, BPA, canceled plans to build a $1.2 billion transmission line between Oregon and Washington. The line was supposed to deliver increased electricity to California. Noting declining usage and new technology, BPA said a combination of flow control devices and batteries would save customers hundreds of millions of dollars. These decisions affect the amount of regional flow that PSE has included in its models. BPA's example shows how modern alternatives could play a bigger role than PSE anticipated five years ago when Energize Eastside was conceived.