

## SECTION 5: INTRODUCTION

### Rebuttal to Asserted Need for Project

PSE justifies the *need* for Energize Eastside by forecasting an annual growth of peak demand of 2.4%. However there is insufficient data to support this conclusion. PSE refused multiple requests for the substation peak-load data necessary to document the actual annual growth rate of annual peak demand on the Eastside.

PSE claims its load flow studies prove that the project would provide *reliable* electricity. However, the studies are based on assumptions that far exceed the Transmission Planning requirements of the North American Electric Reliability Corp (NERC). Therefore, the load flow studies do not *realistically* demonstrate that the project is needed for electrical reliability on the Eastside. In addition, the load flow studies on which the project is based are over five years old, beyond the NERC requirement for updated studies, and NO load flow studies have been conducted using data for only the South Segment of the proposed project.

PSE mounted an expensive and aggressive public relations campaign to sell Energize Eastside. The ads are filled with half-truths that raise fear about the adequacy of our electrical grid for future needs.

### Table of Contents

- 5.1 Needs and Costs of Energize Eastside  
Robert McCullough, Expert Witness
- 5.2 Load Flow Modeling for Energize Eastside + Appendix A  
Richard Lauckhart, Roger Schiffman
- 5.3 Regional Origins of Energize Eastside  
Don Marsh, CENSE
- 5.4 Eastside Customer Demand  
Don Marsh, CENSE
- 5.5 Community Advisory Group (CAG) Dissenting Report
- 5.6 How PSE is Selling Energize Eastside  
Jan Medley, Russell Borgman - CENSE