

ColumbiaGrid Connection & Seattle City Light

Abstract

The formation of the ColumbiaGrid in 2006 was intended to facilitate multi-system transmission planning between its members. The *Memorandum of Agreement* signed on January 31, 2012 between the Department of Energy/Bonneville Power Administration, the City of Seattle/City Light Department and Puget Sound Energy states "*transmission congestion affecting the Puget Sound Area interconnection is a shared problem.*"

A single transmission planning process was implemented beginning in 2015. In July of 2015 a report was published laying out a 10 year plan. Included in this plan was the precursor of what is known today as Energize Eastside. Somewhere along the line, this shared multi-system planning with ColumbiaGrid members was forgotten.

Table of Contents

1. ColumbiaGrid Members and Working Agreements
2. Questions on the Use of Seattle City Light Power Poles for Energize Eastside
3. Regional Reliability Need or Local Reliability Need?
4. Conclusion
5. Appendix

1. ColumbiaGrid Members and Working Agreements

"ColumbiaGrid was formed with seven founding members in 2006 to improve the operational efficiency, reliability, and planned expansion of the Northwest transmission grid. Eleven parties signed ColumbiaGrid's Planning and Expansion Functional Agreement (PEFA) to support and facilitate multi-system transmission planning through an open and transparent process. In addition, starting in 2015, ColumbiaGrid has implemented a single transmission planning process that satisfies the requirements under both PEFA and

Order 1000. This leads to a more comprehensive process which includes a wide range of studies with different purposes."¹ Currently listed as ColumbiaGrid members and participants are:

- Avista Corporation
- Bonneville Power Administration
- Chelan County PUD
- Grant County PUD
- Puget Sound Energy
- Seattle City Light
- Snohomish County PUD
- Tacoma Power
- Other Contributors are: Cowlitz County PUD, Douglas County PUD

2015 was the first year that ColumbiaGrid implemented its planning process under the PEFA/Order 1000 Functional Agreements. In the July 2015 System Assessment Report, it is explained that the process involves a Ten-Year Plan and comprises a list of projects that planning participants are committed to build in the coming years to address known transmission deficiencies.

In the 2015 list of proposed projects this "*Eastside 230/115 kV Transformer and conversion of Sammamish-Lakeside-Talbot Line to 230 kV which provides additional transformer capacity for the Bellevue area and additional transmission capability through the Puget Sound area.*"² was listed. This was an immediate precursor to Energize Eastside as currently proposed by PSE. This point is made clear in an April 30, 2015 letter from the Department of Energy, Bonneville Power Administration to Larry Johnson³

PSE is only one of several members of the ColumbiaGrid who are committed to a multi-system transmission plan in the Pacific Northwest. With regard to the Puget Sound area interconnection, the *Memorandum of Agreement* signed on January 31, 2012 (attached to a FOIA letter from Dept. of Energy to Mr. Larry Johnson dated April 30, 2015) between the Department of Energy/Bonneville Power Administration, the City of Seattle/City Light Department and Puget Sound Energy, details the cooperation expected of these parties in preserving the reliable operation of the Puget Sound Area interconnection.⁴ The document further states that "transmission congestion affecting the Puget Sound Area *interconnection is a shared problem,*"⁵

1 <https://www.columbiagrid.org/client/pdfs/2015SAfinal.pdf>

2 <https://www.columbiagrid.org/client/pdfs/2015SAfinal.pdf> page 59

3 attachment: letter dated April 30, 2015 from Department of Energy to Larry Johnson

4 <https://www.columbiagrid.org/client/PEFA-conformed-copy.pdf>. page 3

5 <https://www.columbiagrid.org/client/PEFA-conformed-copy.pdf>. page 2

Another key member of the ColumbiaGrid is Seattle City Light. This is a municipal electric utility, owned by the residents of Seattle and run by the City's elected officials. The Utility serves a population of almost 700,000 people living in a 130 square-mile area, including the City of Seattle and several adjoining jurisdictions. To serve these customers, City Light owns, maintains, and operates a multi-billion-dollar physical plant. The physical plant includes:

- A distribution system with 14 major substations and more than 2,500 miles of overhead and underground cable;
- A generation system comprising seven hydroelectric plants on the Skagit, Cedar, Tolt, and Pend Oreille Rivers with a combined capacity of almost 2,000 megawatts;
- 650 miles of high-voltage transmission lines linking these plants to Seattle ⁶

⁶ http://www.seattle.gov/financedepartment/1116adoptedcip/documents/SEATTLE_CITY_LIGHT.pdf

2. Questions on the Use of the Seattle City Light Power Poles for Energize Eastside

As the map below illustrates, several miles of the SCL transmission line are actually located on the Eastside, running from the northern border of the proposed Energize Eastside project in Redmond through Bellevue and Newcastle and into Renton, the southern border of the proposed PSE 230kV transmission line.

Location of Seattle City Light Transmission Line on Eastside

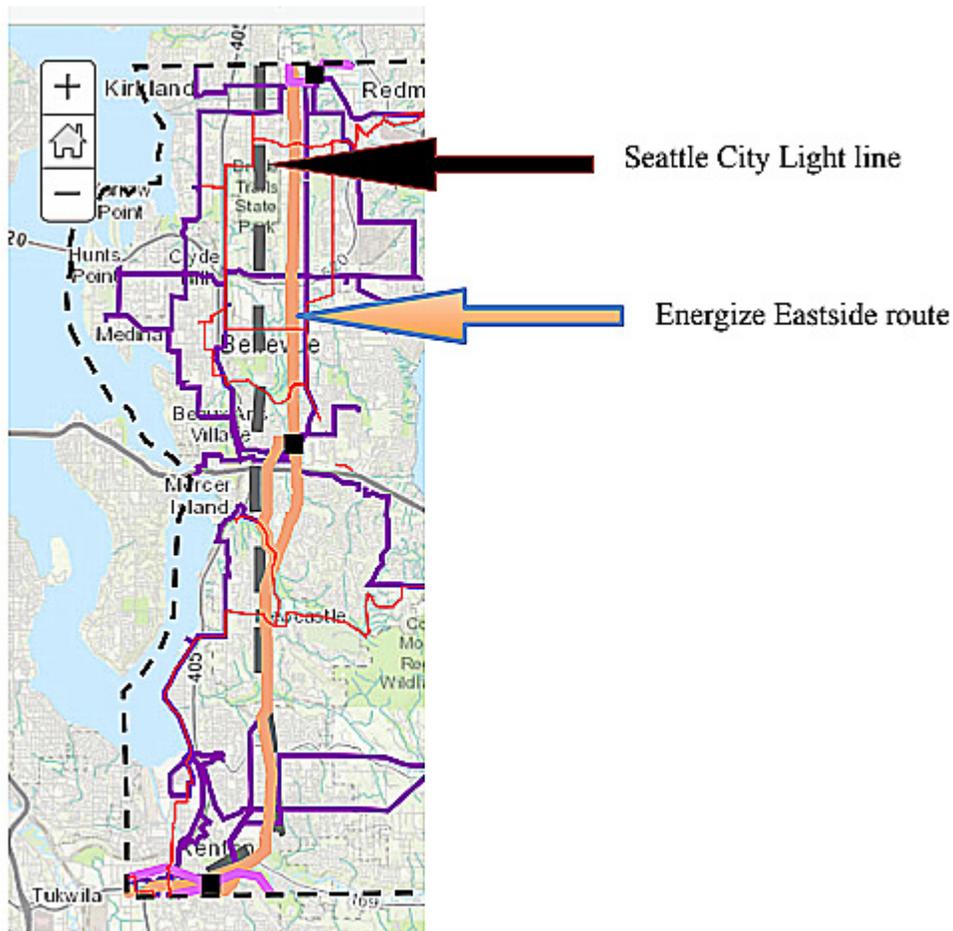


Figure 1 SCL represented by dashed black line parallels the route of Energize Eastside through much of Bellevue.

One of the alternatives not fully addressed by PSE for the proposed Energize Eastside project is the use of Seattle City Light power poles for the 230kV transmission lines.

Uzma Siddiqi of Seattle City Light, in a letter to Nichols Matz of the City of Bellevue dated June 2, 2014,⁷ stated that SCL preferred not to use SCL's transmission lines for PSE's *native load service needs*.

In 2017 the question was again asked about using the existing SCL transmission towers to support the purportedly needed 230kV PSE transmission lines. The letter to Mr. Larry Weis, Seattle City Light, from Larry Johnson dated March 20, 2017 asked that question.⁸ The response was written by Sephir Hamilton, Seattle City Light, on April 25, 2017. Mr. Hamilton replied that "PSE has never formally requested transmission service on Seattle City Light's Eastside transmission lines." "Obviously, if PSE would make a formal request for transmission service on Seattle City Light's Eastside lines, Seattle City Light would respond appropriately."⁹

The letter also contends "Energize Eastside project is not subject to the Order No. 1000 because it is located completely within Puget Sound's service territory." Further, "neither Puget Sound nor any eligible party requested to have the project selected in the regional transmission plan for purposes of cost allocation."¹⁰

It is apparent from these attached letters that the use of the Seattle City Light transmission line towers was an *alternative not fully researched nor pursued* by PSE in their planning.

3. Regional Reliability Need or Local Reliability Need?

In original proposals for Energize Eastside by PSE, studies were included that described 1,500 MW flow to Canada as a necessary component to this proposal.

This would indicate that Energize Eastside was developed as a *regional plan*.

In the *Memorandum of Agreement* signed on January 31, 2012, by representative parties from Seattle City Light, Bonneville Power Administration and Puget Sound Energy, it specifies the memorandum as relating to the Preferred Puget Sound Area Plan of Service Projects and Cost Allocation. There is emphasis on sharing the problems in the Puget Sound Area, with *projects and cost sharing arrangements* provided as appropriate.¹¹ Under the title: *Preliminary Capital Cost Allocation*, it is stated that "Parties agree to share in the capital costs of Preferred Plan Projects." For Puget (Sound Energy) plan projects, it is stated that "BPA

7 attachment: letter dated June 2, 2014 from Uzma Siddiqi, Seattle City Light, to Mr. Nicholas Matz

8 attachment: letter dated May 20, 2017 from Larry Johnson to Larry Weis, General Mgr. Seattle City Light

9 attachment: letter dated April 25, 2017 from Sephir Hamilton to Mr. Larry Johnson

10 attachment: letter dated April 25, 2017 from Sephir Hamilton, Seattle City Light, to Mr. Larry Johnson

11 attachment: Memo of Agreement obtained through FOIA from Dept of Energy, Bonneville Power Admin. page 2

and Seattle City Light shall each pay to Puget an amount equal to one-third of the adjusted projected capital cost of the Maple Valley to SnoKing Reconductor Project."¹²

All this leads to the conclusion that Energize Eastside, labeled as the Maple Valley to SnoKing Reconductor Project, is a regional project.

There are questions that need to be answered: is Energize Eastside a regional project or is it for local service needs? If it is for local service needs, why is the 1,500 MW flow to Canada part of the original proposal? Given the *Memorandum of Agreement* stipulations, why is PSE not requesting the cost of the project to be shared by BPA and SCL? The arrangement pursued by PSE only places the cost of the project on the PSE rate base - the residents of the Eastside.

In the 2008 Acknowledgement Letter to PSE on the 2017 Integrated Resource Plan, the WUTC addresses Energize Eastside with the comment that "it is still not clear if a joint utility analysis of all available transmission and potential interconnections in the Puget Sound region might solve the Energize Eastside reliability issues." A further criticism: "PSE's choice not to provide modeling data to stakeholders with Critical Energy Infrastructure Information clearance from FERC"¹³

4. Conclusion

A cooperative road plan was in place among ColumbiaGrid members for solving any transmission deficiencies on the Eastside. It is clear that PSE did not fully research or pursue use of the Seattle City Light transmission line towers for any purported reliability needs.

¹² attachment: Memo of Agreement obtained through FOIA from Dept of Energy, Bonneville Power Admin. page 6
¹³

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=5&ved=2ahUKEwiTirrhocPdAhUjGzQIHdN2BmMQFjAEegQIBhAC&url=https%3A%2F%2Fwww.utc.wa.gov%2F_layouts%2F15%2FCasesPublicWebsite%2FGetDocument.ashx%3FdocID%3D1743%26year%3D2016%26docketNumber%3D160918&usg=AOvVaw3yNtZgvlPKizND-bXT6fcQ page 10

5. Appendix A



City of Seattle

Seattle City Light

June 2, 2014

Mr. Nicholas Matz
Planning & Community Development Department
450 110th Avenue NE
P.O. Box 90012
Bellevue, WA 98009

Dear Mr. Matz:

Seattle City Light (SCL) has transmission facilities that run through the City of Bellevue and other jurisdictions on the east side of Lake Washington. The SCL transmission lines in Bellevue were installed in the early 1940's to transfer power from hydro-generation in the North Cascades to the west side of Lake Washington. Puget Sound Energy (PSE) has lines in the same general vicinity which primarily serve the PSE customer load east of Lake Washington.

SCL's double circuit 230kV transmission lines are used to meet current and future operating needs. Specifically, SCL needs the connectivity and capacity of these transmission lines to:

- Maintain a contiguous Point of Delivery for transmission service from BPA;
- Serve existing load growth and maintain reliability;
- Provide for future SCL growth;
- Support regional transmission flows; and
- Meet NERC reliability requirements.

SCL foresees current and future uses of these existing east side facilities and prefers not to utilize SCL's transmission lines for PSE's native load service needs.

Please contact me via email at uzma.siddiqi@seattle.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Uzma Siddiqi".

Uzma Siddiqi, PE
System Planning Engineer

cc: Phil West
Tuan Tran



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April 25, 2017

Mr. Larry Johnson
Attorney at Law
Citizens for Sane Eastside Energy (CSEE)
8505 129th AVE SE
NEWCASTLE, WA 98056

Re: PSE's Energize Eastside Project

Dear Mr. Johnson,

This letter responds to your letter dated March 20, 2017 to our General Manager, Larry Weis. We appreciate your interest in the regional energy issues and are aware of your concerns regarding Puget Sound Energy's ("PSE") Energize Eastside Project. As your letter mentions, although PSE and Seattle City Light have had limited discussions about PSE's Energize Eastside Project, PSE has never formally requested transmission service on Seattle City Light's Eastside transmission lines. Obviously, if PSE would make a formal request for transmission service on Seattle City Light's Eastside lines, Seattle City Light would respond appropriately. Likewise, Seattle City Light remains willing to discuss options with PSE regarding the potential use of Seattle's Eastside lines. However, as PSE's project located entirely within its own service territory, PSE's project remains within PSE's discretion.

In addition, the Energize Eastside Project is not subject to the Order No. 1000 regional approval process because it is located completely within Puget Sound's service territory, it was included in Puget Sound's local transmission plan to meet Puget Sound's reliability needs, and neither Puget Sound, nor any other eligible party, requested to have the project selected in the regional transmission plan for purposes of cost allocation.

We trust that this resolves the concerns expressed in your March 20th letter with respect to Seattle City Light.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sephir Hamilton".

Sephir Hamilton
Engineering and Technology Innovation Officer
Seattle City Light

COLUMBIAGRID

**PLANNING AND EXPANSION
FUNCTIONAL AGREEMENT**

January 17, 2007

Full 98-page Report @ <https://www.columbiagrid.org/client/PEFA-conformed-copy.pdf>