

Bedwell, Heidi

From: Bob Moore <bmooreii@comcast.net>
Sent: Monday, October 15, 2018 10:49 AM
To: Bedwell, Heidi
Subject: Comment on PSE's CUP Application, Energize Eastside

Dear Ms. Bedwell,

I am writing to request that PSE's CUP application be denied. The project itself is suspect in several aspects which have been thoroughly documented by CENSE and many other citizens. I am particularly concerned about the negative impact on neighborhood safety and security, environmental quality and the questionable need for this electrical capacity increase designed to enrich foreign investors at the expense of current and future rate payers. That is just not fair and is an injustice to the citizens of Bellevue and other eastside communities.

In addition, I have learned that the project appears to violate Bellevue Land Use Codes, specifically LUC 20.20.255 and 20.30B.140. The general context of these codes is:

- the location hierarchy for new or expanded electrical facilities stipulates that residential areas are the *last* choice to be considered.
- the site chosen should be located within the land use district requiring additional service and residential land use districts to be avoided. (The expressed need for electrical reliability is in downtown Bellevue - that's where any new or expanded facility should be placed.)
- The project as proposed is not "*compatible with nor responds to the existing or intended character, appearance, quality of development and physical characteristics of the subject property and immediate vicinity.*"

Thank you for listening,

W. Robert Moore

4707 135th Place SE

Bellevue, WA 98006

Bedwell, Heidi

From: Dave Mickelson <DaveMickelson@comcast.net>
Sent: Sunday, October 21, 2018 11:15 AM
To: Bedwell, Heidi
Subject: Comment on PSE's CUP Application, Energize Eastside Dave Mickelson

Comment on PSE's CUP Application, Energize Eastside

- The location hierarchy for new or expanded electrical facilities stipulates that residential areas are the *last* choice to be considered.
- The site chosen should be located within the land use district requiring additional service and residential land use districts to be avoided.
- The expressed Need for electrical reliability is in downtown Bellevue - that's where any new or expanded facility should be placed.
- The project as proposed is not "*compatible with nor responds to the existing or intended character, appearance, quality of development and physical characteristics of the subject property and immediate vicinity.*"

~~~

**Dave and Denise Mickelson**  
(425) 829-8483  
[DaveMickelson@comcast.net](mailto:DaveMickelson@comcast.net)

4518 Somerset Drive SE  
Bellevue, WA 98006-3062

## Bedwell, Heidi

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**From:** Don Marsh <don.m.marsh@hotmail.com>  
**Sent:** Monday, October 08, 2018 7:20 AM  
**To:** Bedwell, Heidi  
**Cc:** Council; Miyake, Brad  
**Subject:** PSE's response to Bellevue questions is inadequate  
**Attachments:** Response to PSE answers on Energize Eastside.pdf

Dear Ms. Bedwell,

Please see the attached letter regarding PSE's response to Bellevue's questions about the Energize Eastside project. The company must provide actual data to justify the need and schedule of the project.

Sincerely,  
Don Marsh

October 8, 2018

Heidi Bedwell  
Environmental Planning Manager City of Bellevue  
450 110th Avenue NE  
Bellevue, WA 98004

RE: PSE's response to City's questions about the South Bellevue Segment Energize Eastside

Dear Ms. Bedwell,

We have reviewed PSE's response to Bellevue's questions about Energize Eastside, dated September 21, 2018.<sup>1</sup> PSE's carefully worded evasions and notable lack of quantitative data do not meet the burden of proof required by Bellevue LUC 20.20.255D.2.c.i ("...whether the electrical utility facility location is a consequence of *needs or demands from customers located within the district or area.*")

There is ample evidence to question PSE's claim that the Eastside electric grid is on the verge of collapse. PSE recently stated that their current peak load forecasts have fallen by 4.9%.<sup>2</sup> Although PSE has not provided a peak load forecast specifically for Bellevue, the greater Eastside accounts for approximately 14% of PSE's total load. It is possible that falling demand in Bellevue and the Eastside is contributing to the overall reduction in peak loads.

In 2015, Bellevue hired an independent analyst to examine the need for Energize Eastside. The analyst cited PSE's assumption that large projects in downtown Bellevue would add 42 MW to peak loads on the Eastside by 2018.<sup>3</sup> PSE provides no evidence that this increase has occurred. Using data provided by PSE, Bellevue's Environment Stewardship website observes, "Conservation combined with increased population growth have tended to keep total community use fairly flat since 2011."

PSE's letter states:

*PSE does not track Eastside actual load data in real time as part of its regular operations. PSE does track the system peak. The 2017 system summer peak exceeded PSE's forecasted 2018 summer normalized system peak used in the Eastside studies.*<sup>4</sup>

Our industry experts, who collectively represent decades of relevant experience, believe this is a disingenuous answer. PSE, like all other major utilities, has an extensive Supervisory Control and Data Acquisition system designed to monitor generating stations, transmission lines, and

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<sup>1</sup> South Bellevue Segment Energize Eastside – Response to Technical Review Letter, Part 1 ([https://development.bellevuewa.gov/UserFiles/Servers/Server\\_4779004/File/pdf/Development%20Services/EnergizeEastside/PSE-EE-Response-Technical-Review-Letter-Part1.pdf](https://development.bellevuewa.gov/UserFiles/Servers/Server_4779004/File/pdf/Development%20Services/EnergizeEastside/PSE-EE-Response-Technical-Review-Letter-Part1.pdf))

<sup>2</sup> 2019 IRPAG Meeting #2, PSE, August 20, 2018, page 20.

<sup>3</sup> Independent Technical Analysis of Energize Eastside for the City of Bellevue, WA, April 28, 2015, Version 1.3, page

<sup>4</sup> Op Cit., page 1.



substations. This is commonly known as SCADA.

As of 2015, PSE had installed 24 SCADA monitoring and control units in Bellevue’s Central Business District.<sup>5</sup> At that time, PSE planned to install 42 more units. PSE recently released a report which includes detailed data on two of their substations – including individual forecasts out to 2027.<sup>6</sup> Clearly, if the data were truly unavailable, it would be impossible to prepare hour-by-hour demand forecasts for specific substations during the next decade.

The industry as a whole has reported low or negative growth in peak loads for the past decade. Changes in technology have reduced the need for new generation and transmission. For example, Seattle City Light, the publicly owned utility adjacent to Puget Sound Energy, has recently published a new load forecast that predicts peak load reductions for the next twenty years:<sup>7</sup>

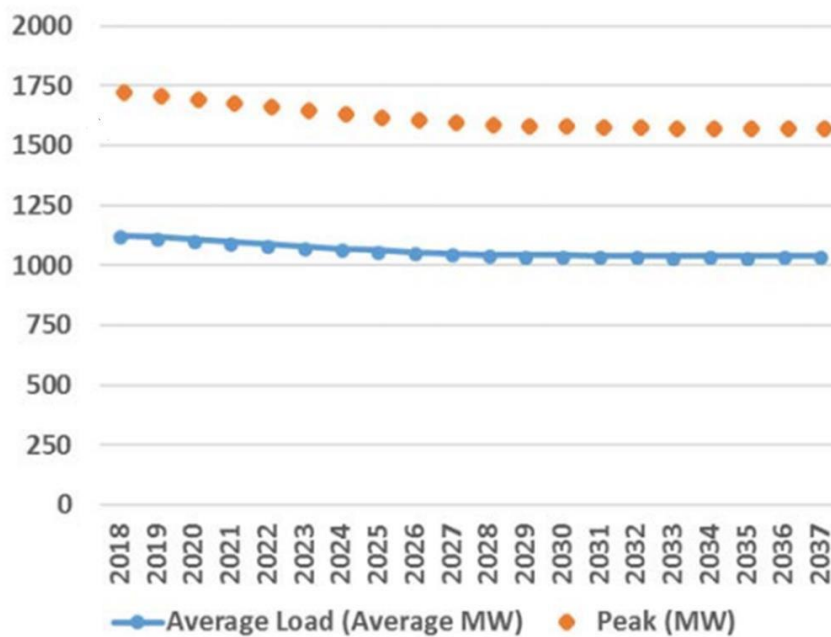


Figure 1. City Light's normal peak and retail load forecast

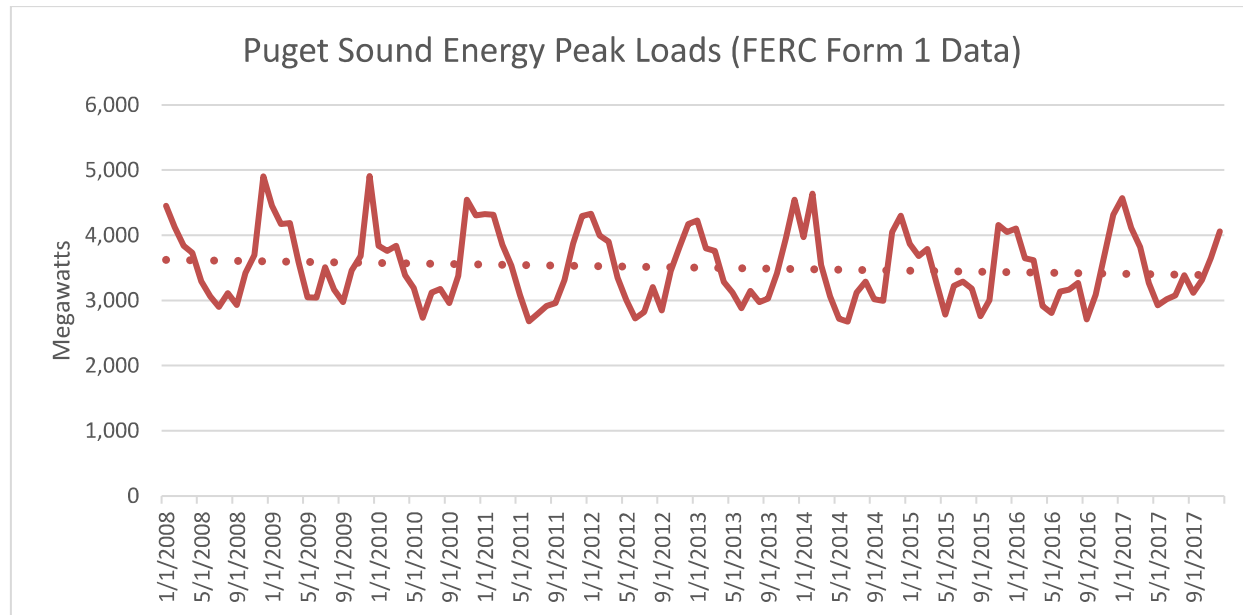
Seattle has the same weather as the Eastside. Rates of population and economic growth are similar on both sides of Lake Washington (housing construction is actually higher in Seattle). Both utilities have access to the same technology for electrical efficiency. Customers of both utilities have a similar interest in reducing energy consumption to minimize harm to the environment. However, PSE and Seattle City Light have very different incentives. Seattle City Light is owned by its consumers and pursues overall cost reductions. Investor owned utilities must continue to invest in infrastructure projects to increase profits.

<sup>5</sup> Puget Sound Energy 2015 Service Quality and Electric Service Reliability Report, March 29, 2016, page 51.

<sup>6</sup> Eastside System Energy Storage Alternatives Assessment Report Update – September 2018, Mark Higgins and Stephen Sproul, Stratgen Consulting, September 2018, pages 39 and 41.

<sup>7</sup> 2018 PROGRESS REPORT, Seattle City Light, September 24, 2018, page 10.

While Puget Sound Energy has restricted the amount of information it has provided to Bellevue and neighboring municipalities, it is required to supply detailed information to state and federal authorities. Almost all of this information is public, although it is not always sufficiently disaggregated to the municipal level. For example, PSE’s peak loads have declined over the past decade:<sup>8</sup>



The dotted line shows a gradual decrease in peak demand over the past decade.

CENSE has repeatedly asked PSE to supply summer and winter demand peaks for each substation in the Eastside area. This data is necessary to evaluate the overall need for the project, and to determine whether a smaller, more targeted solution could address any growth hot spots, potentially saving hundreds of millions of dollars for ratepayers.

PSE refused our most recent request:

*This request is very similar to the request you made in March 6, 2016 for individual substation load data for a six-year time period. In PSE’s response to you dated May 13, 2016, we stated, “Historical loading on individual substations is confidential in order to protect customer sensitive information so this request is denied.” Unfortunately, the passage of time has not altered PSE’s position that such information compromises the confidential nature of customer sensitive information, so this request is again denied.<sup>9</sup>*

<sup>8</sup> Capacity loads reported by PSE to the Federal Energy Regulatory Commission on Form 1 page 401b for the years 2008 through 2017.

<sup>9</sup> Letter to Don Marsh via Express Mail, September 19, 2018

PSE has claimed that release of such data would compromise customer sensitive information. The claim of customer confidentiality is difficult to understand, because each substation serves thousands of customers. Is it possible to identify the consumption of one customer using 10 or 20 data points spanning the highest summer and winter usage over a decade? Not only is this improbable, the standard solution in such cases is to mask the data or to execute a protective order.

The WUTC has criticized PSE's lack of documentation on this issue and other issues raised by stakeholders in the 2017 Integrated Resource Plan:

*The Plan does not include a narrative regarding:*

- *The effect of the power flows due to entitlement returns on the need for the Energize Eastside Project.*
- *The reason for, and effect on the need for the Energize Eastside Project, of modeling zero output from five of PSE's Westside thermal generation facilities.*
- *PSE's choice not to provide modeling data to stakeholders with Critical Energy Infrastructure Information clearance from FERC.*
- *Resolution of the effect of lower load assumptions on the need for Energize Eastside Project.<sup>10,11</sup>*

If PSE doesn't provide actual data to answer these questions, Bellevue and other Eastside cities cannot be sure that an electrical reliability problem truly exists and, if one does, whether this project would provide cost-effective relief. The cities and their citizens will not be able to participate in public hearings in a well-informed manner. Suspicion will linger that PSE pursued this project to benefit its bottom line, rather than improving the reliability of Eastside electricity.

Please represent our mutual interests and demand clear answers from PSE.

Sincerely,



Don Marsh

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<sup>10</sup> Acknowledgment Letter Attachment Puget Sound Energy's 2017 Electric and Natural Gas Integrated Resource Plan in Dockets UE-160918 and UG-160919, May 7, 2018, page 10.

<sup>11</sup> Critical Energy Infrastructure Information clearance from FERC is routinely provided in cases such as this. My clearance was approved by FERC on April 8, 2016.

## Bedwell, Heidi

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**From:** Frank and Julie Bosone <fbosone@comcast.net>  
**Sent:** Sunday, October 21, 2018 2:19 PM  
**To:** Bedwell, Heidi  
**Subject:** The ultimate irony  
**Attachments:** image001.png

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ms Bedwell

Shortly after sending you the e-mail below, I received in the mail a brochure from Olympic Pipeline titled "Pipeline safety in your community." Given the ongoing controversy about Energiise Eastside I can't help but assume the publication was prompted by the folks at PSE. In their defense there is a section titled "How to recognize a pipeline leak." Question? I was told the nearest response unit to fight an aviation leak/fire is at Sea—Tac airport. If so, response time, depending on time of day would be 1 to 2 hours. Not an encouraging prospect. Response?

Thanks for your feedback.

Frank Bosone

Sent from [Mail](#) for Windows 10

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**From:** [Frank and Julie Bosone](#)  
**Sent:** Friday, October 19, 2018 2:16 PM  
**To:** [Bedwell, Heidi](#)  
**Subject:** RE: September 6 informational meeting notice

Ms Bedwell:

Thank you for the quick and thorough response to my questions.

I have one ongoing concern about the Olympic Pipeline Facility Response Plan. It appears that all of the agencies listed below have approved the plan but one entity has been left out - the public who would be most impacted by a break in the pipeline from a seismic event or construction accident. I was instrumental in establishing the first neighborhood emergency preparedness organization in Somerset 15 years ago. Annually we update our neighbors on what to do in the event of a power outage, snow storm, any natural disaster. Don't our neighbors deserve to know what to do in the event of dramatic event like a pipeline break/fire? Should we evacuate? Shelter in place? Run up hill? Run downhill? Appears to me that Olympic is using the current trendy explanation "security risk" as an excuse not to provide the public with details of its emergency plan. Seems to me the city of Bellevue should be equally concerned given some history; Bellingham fire and deaths, Wallingford gas leak and fire and recent gas break in British Columbia. An aging pipeline and PSE's sloppy safety record are a recipe for a disaster in any suburban/residential area. To suggest that it can't happen here is folly.

Thanks for your work.

Frank Bosone

Sent from [Mail](#) for Windows 10

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**From:** [Bedwell, Heidi](#)

**Sent:** Tuesday, October 16, 2018 9:56 AM

**To:** [fbosone@comcast.net](mailto:fbosone@comcast.net)

**Subject:** RE: September 6 informational meeting notice

Mr. Bosone:

Thank you for your comments and questions regarding PSE's Energize Eastside project. Your comments will be part of the city's file on the application and will be considered as part of our review of the permit.

The city recognizes the importance of making sure the proposed project does not cause any harm associated with both the construction and operation of the electrical transmission line. The risks of accidents in the pipeline corridor is acknowledged in the Phase 1 Draft EIS, and more fully discussed in the Phase 2 Draft EIS. Most accidents are caused by a failure to properly locate the underground utility during construction. In the case of the corridor shared by PSE's transmission line and the Olympic Pipeline system, PSE and Olympic have worked together in the corridor for 40 years and communicate regularly to coordinate activities related to pole replacement and other maintenance work.

The Final EIS includes information about Preventing Unintentional Releases and this information can be found on page 4.9-7 of the FEIS. Mitigation measures being considered as part of this permit project review can also be found in Sections 4.9.8 and 5.9.4.2. Finally, Appendix I-2 contains additional pipeline safety information including Olympic Pipeline Company's construction requirements and PSE's Corridor Safety FAQ sheet.

[http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/chapter\\_4.9\\_pipeline\\_safety.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/chapter_4.9_pipeline_safety.pdf)

[http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/chapter\\_5\\_short-term\\_construction\\_impacts.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/chapter_5_short-term_construction_impacts.pdf)

[http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/appendix\\_i\\_pipeline\\_safety.pdf](http://www.energizeeastsideeis.org/uploads/4/7/3/1/47314045/appendix_i_pipeline_safety.pdf)

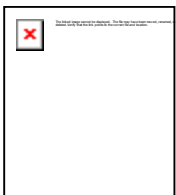
<http://www.energizeeastsideeis.org/library.html>

Olympic's Facility Response Plan is not made available to the public. Rather, it is shared with federal, state, and local officials, including emergency planning agencies and first responders, to strengthen and coordinate planning and prevention activities, with certain key information redacted due to potential security risk. The plan provides guidelines to prepare for and respond to a spill from the Olympic Pipeline system. The Facility Response Plan, which received final 5-year approval by Ecology in 2016, serves as Olympic's oil spill contingency plan under WAC 173-182. The Facility Response Plan is based on the Northwest Area Contingency Plan (Regional Response Team 10 and Northwest Area Committee, 2016), as approved by Ecology and the federal Pipeline Hazardous Materials Safety Administration. Section 15.3.1.3 of the Phase 1 Draft EIS states that the local fire department and Olympic technical staff would be contacted simultaneously, but fire departments within other jurisdictions could be dispatched as backup, as could Olympic, Port of Seattle Fire Department, and Boeing for backup equipment and fire suppression supplies.

Thank you again for your interest in this project.

Sincerely,

-Heidi Bedwell



**Heidi M. Bedwell**

Environmental Planning Manager, Land Use Division

Development Services Department

425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Frank and Julie Bosone <fbosone@comcast.net>  
**Sent:** Thursday, October 11, 2018 8:55 AM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Subject:** FW: September 6 informational meeting notice

Ms Bedwell

Your failure to respond to my Sept. 24 e-mail reinforces my concern that the city does not have an emergency plan in the event of a break in the petroleum pipeline in my front yard. My concern was only heightened this week with news of the gas pipeline break in BC. Is there a plan? If so why not make it public?

Frank & Julie Bosone

Sent from [Mail](#) for Windows 10

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**From:** [Frank and Julie Bosone](#)  
**Sent:** Monday, September 24, 2018 10:00 AM  
**To:** [Bedwell, Heidi](#)  
**Subject:** RE: September 6 informational meeting notice

Ms Bidwell

Some background: We have lived at 4544 Somerset Drive for 50 years. The petroleum pipeline runs through our frontyard and the existing PSE power lines through our backyard. One half block south of us the two line are co-located a few feet apart. QUESTION? Given PSE's questionable safety record and weekly predictions by experts of a major seismic event in the future, what provisions does the city of Bellevue have in place should there be a catastrophic break in the petroleum pipeline? Is there any contingency plan if there is a construction accident? What is the plan and is it available for public review and comment?

Thanking you in advance.

Frank & Julie Bosone  
E [fbosone@comcast.net](mailto:fbosone@comcast.net)  
C 435-246-9370

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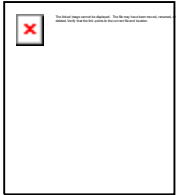
**From:** [Bedwell, Heidi](#)  
**Sent:** Tuesday, September 18, 2018 7:11 AM  
**To:** [Frank and Julie Bosone](#)  
**Subject:** RE: September 6 informational meeting notice

Mr. and Mrs. Bosone,

I am sorry to hear that the notice of the public meeting arrived at your home well after the actual public meeting date. The meeting notice was mailed two weeks in advance of the meeting therefore I am unclear why the mailing took so long to reach you in the Somerset area. I can understand how this could be frustrating. It is unfortunate to hear you were left with the impression that this was an intentional act, please be assured it was not.

I am happy however to answer any questions you may have about the permitting process which was covered during the public meeting. I would also recommend you visit, if you haven't already, the city's permit project page for additional information <https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates/> You can also subscribe to alerts to receive email or text notification when this page is updated with pertinent information.

Sincerely,  
-Heidi



**Heidi M. Bedwell**

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**From:** Frank and Julie Bosone <[fbosone@comcast.net](mailto:fbosone@comcast.net)>  
**Sent:** Thursday, September 13, 2018 4:48 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Subject:** September 6 informational meeting notice

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Frank & Julie Bosone (Bellevue residents since 1964)  
4544 Somerset Drive SE  
Bellevue 98006

Sent from [Mail](#) for Windows 10

## Bedwell, Heidi

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**Sent:** Friday, October 19, 2018 2:16 PM  
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**Subject:** RE: September 6 informational meeting notice Frank Bosone#3  
**Attachments:** image001.png

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**Heidi M. Bedwell**

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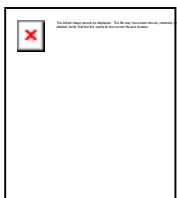
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-Heidi



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Frank & Julie Bosone (Bellevue residents since 1964)  
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Bellevue 98006

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## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Thursday, October 04, 2018 1:52 PM  
**To:** 'James Adcock'  
**Subject:** RE: Energize Eastside Pole Configuration in Somerset?  
**Attachments:** Bellevue South Segment.pdf

The poles heights PSE is proposing are generally similar to the designs studied in the EIS for the Somerset area (See attached excerpt from the EIS). The City of Bellevue asked in our permit application revision letter for PSE to explore how pole heights could be further reduced in the Somerset area. The revision you are reviewing contains a preliminary design that responds to the request by the city. PSE has not proposed modifying their original proposed design with the lower pole heights. The submitted documents are meant to illustrate the effects of lowering pole heights. PSE has said that lower poles would require more poles resulting in the placement of new poles on properties that do not currently have poles. Staff are evaluating this alternative design as well as PSEs proposal. The photo simulations included in PSE Additional Project Plans and Reports depict this alternative design.



**Heidi M. Bedwell**  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** James Adcock <jimad@msn.com>  
**Sent:** Thursday, October 04, 2018 12:53 PM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Subject:** Energize Eastside Pole Configuration in Somerset?

I am trying to review the recently updated permit information on the Bellevue web site as show in the email from City of Bellevue of 10/2/2018 "Energize Eastside South Bellevue Permits Update" -- now that that web site is up and running again, and what I think I am reading is that Puget has reverted to their original "full height" vertical wire configuration poles, instead of the lower horizontal wire configuration poles that they had stated in their EIS that they would be using in Somerset (in response to citizen concerns) to reduce impact on Somerset Environmental Quality -- View Sightlines.

<https://development.bellevuewa.gov/zoning-and-land-use/public-notices-and-participation/energize-eastside-updates>

"Somerset Pole Designs"

Is this correct? What is the point of an EIS and public comment if Puget is simply going to ignore that process after the fact and simply resort back to their original plans and pole designs that did not consider the "Somerset Environmental Quality -- View Sightlines" problem?

Sincerely,

James L. Adcock, Electrical Engineer  
5005 155th PL SE  
Bellevue WA 98006  
[jimad@msn.com](mailto:jimad@msn.com)  
425-562-0217

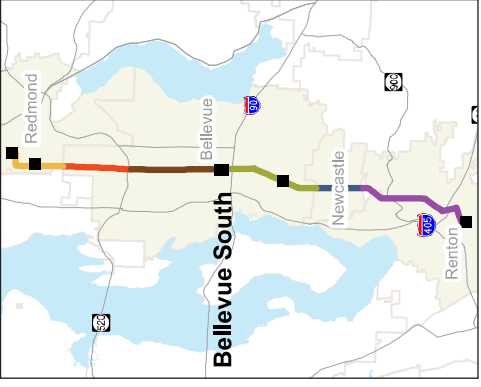


# Bellevue South Segment

## DESCRIPTION

**Start:** Richards Creek Substation (New)  
**End:** Bellevue-Newcastle Boundary

*PSE's Proposed Alignment*



## PROPOSED POLES & LOCATION

### 1 Double-Circuit Steel Monopole

- Location: Existing corridor north of SE Newport Way and between Somerset Substation and SE 60th St.
- Approximately 22 wooden H-frames replaced with approximately 16 double-circuit 230 kV steel monopoles.
- Typical height = 92'; (existing: 60')
- Maximum height = 109'; (existing: 90')

### 2 Single-Circuit Steel Pairs

- Location: Existing corridor south of SE 60th St. and between SE Newport Way and Somerset substation.
- Approximately 26 wooden H-frames replaced with approximately 26 pairs of single-circuit 230 kV steel monopoles.
- Typical height = 80'; (existing: 60')
- Maximum height = 91'; (existing: 90')

## QUICK FACTS

**Jurisdiction:** Bellevue

**Segment Length:** 3.3 miles

### Easement / Property Acquisition

- Entirely in PSE's existing 100-foot corridor; no new easements or property acquisition needed.

### Olympic Pipeline Info

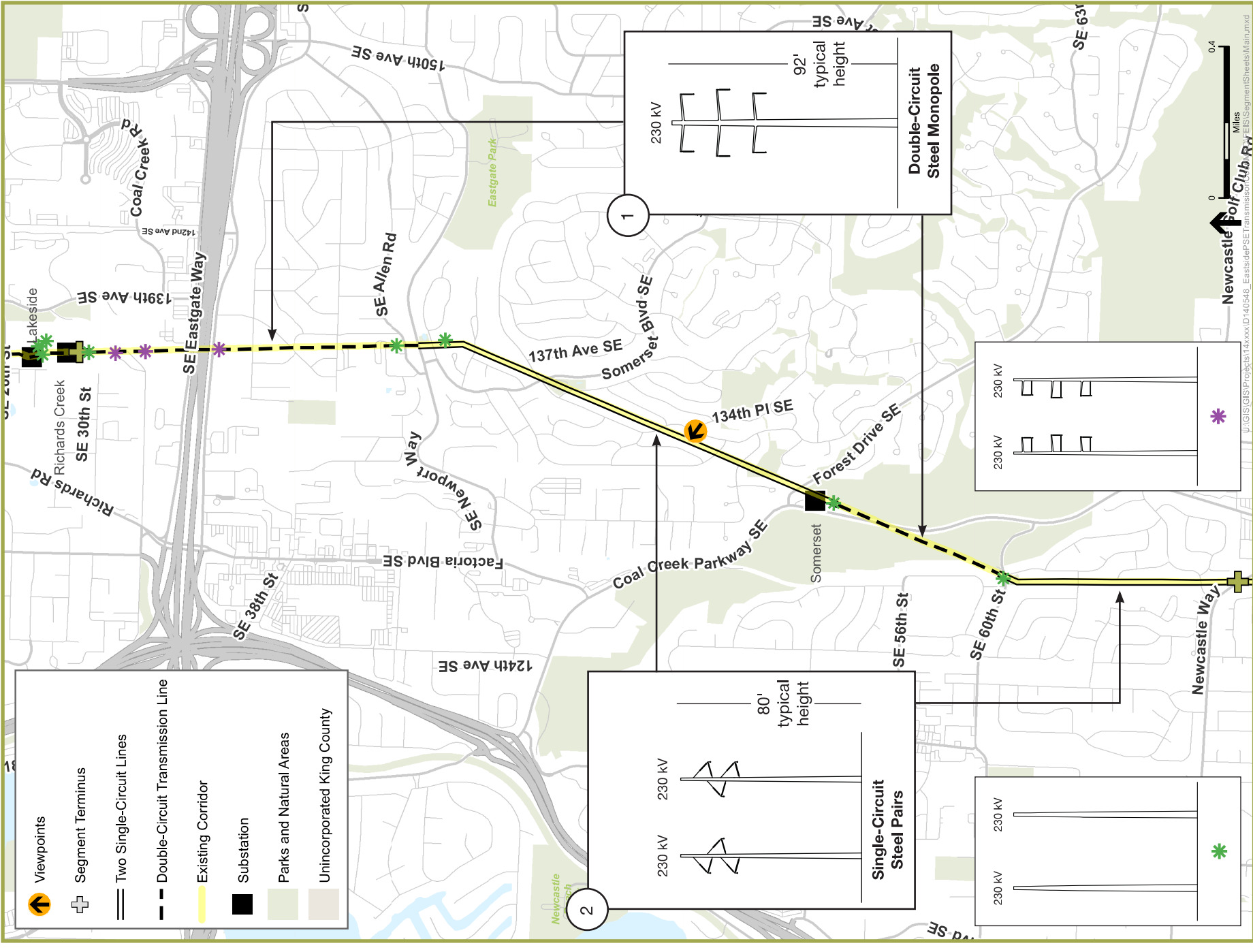
- 16" pipeline uses existing corridor (often in the center); poles would be placed on either side.
- 20" pipeline uses existing corridor south of Somerset.



From 134th Pl SE looking west (existing conditions)



Simulation of proposed project (Power Engineers, 2017)



## Bedwell, Heidi

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**From:** Joel Glass <joelpglass@hotmail.com>  
**Sent:** Thursday, October 18, 2018 9:29 AM  
**To:** Bedwell, Heidi  
**Subject:** Joel Glass Comments on PSE's Energize Eastside permit application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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. The project is simply a money grab taking advantage of our poorly written rules for utilities. We have no real choice in who provides our electrical power and this monopoly should not be allowed to steamroll its ratepayers and the citizens of Bellevue.
2. It is risky to install tall power poles within feet of two half-century-old petroleum pipelines. The heavy equipment and differential settlement are great risk to these aging fuel lines.
3. It damages communities and the environment by removing thousands of valuable urban trees. These power lines are running through people's front and back yards. This project will destroy these areas for years to come. The easements in these areas never contemplated this sort of abuse. What happened to "city in a park"???
4. There are less costly ways to enhance the reliability and resiliency of the Eastside power grid. Reliable and trustworthy studies show that these power lines are not needed to serve us but we will be charged nonetheless. Again this is a money grab looking to take advantage of our poorly written codes since this sort of abuse was never contemplated.

Please notify me when any Bellevue public hearing for this project is announced.

Sincerely,  
Joel Glass

4216 – 137th AVE NE

Bellevue, WA 98004



## Bedwell, Heidi

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**From:** Julie Beffa <j.e.beffa@gmail.com>  
**Sent:** Monday, October 08, 2018 6:58 PM  
**To:** Bedwell, Heidi  
**Subject:** Julie Beffa Comments on PSE's Energize Eastside permit application

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Bedwell,

I am writing to ask that the city NOT approve PSE's application to build Energize Eastside because:

After reading the latest report on Climate Change published in the Washington Post, “There is no documented historic precedent” for the sweeping change to energy, transportation and other systems required to reach 1.5 degrees Celsius, the U.N. Intergovernmental Panel on Climate Change (IPCC) [wrote](#) in a report requested as part of the 2015 Paris climate agreement.

[https://www.washingtonpost.com/energy-environment/2018/10/08/world-has-only-years-get-climate-change-under-control-un-scientists-say/?noredirect=on&utm\\_term=.ae739947aea9&wpisrc=nl\\_most&wpmm=1](https://www.washingtonpost.com/energy-environment/2018/10/08/world-has-only-years-get-climate-change-under-control-un-scientists-say/?noredirect=on&utm_term=.ae739947aea9&wpisrc=nl_most&wpmm=1)

In this report, it was noted that the radical transformation also would mean that, in a world projected to have more than 2 billion additional people by 2050, **large swaths of land currently used to produce food would instead have to be converted to growing trees that store carbon and crops designated for energy use. The latter would be used as part of a currently nonexistent program to get power from trees or plants and then bury the resulting carbon dioxide emissions in the ground, leading to a net subtraction of the gas from the air — bioenergy with carbon capture and storage, or BECCS.**

And PSE wants to cut down a minimum of 300 trees right in Bellevue's back yard for a project that data has already shown isn't needed!! Stop being a self-promoting corporate entity, and start being an advocate for science. Instead, be an advocate for bioenergy with carbon capture and storage. Cutting down hundreds of trees is the antithesis of protecting the environment. Dire carbon emissions levels have now been documented. How can PSE, in good faith, propose an energy strategy that is outdated and not needed, in the face of the Paris climate agreement. Following the archaic mindset of this administration's attempt to dismantle the EPA isn't showing civic leadership and responsibility or environmental stewardship.

Our community needs more trees!!! not fewer trees!

All of these items are true also!



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.

**Julie Beffa**  
9110 NE 21st Place  
Clyde Hill, WA 98004

## Bedwell, Heidi

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**From:** Bedwell, Heidi  
**Sent:** Thursday, October 04, 2018 10:03 AM  
**To:** 'Kesayian'  
**Cc:** jcdemund@gmail.com; bbraun@stratery.com; jpmedley@mac.com; loretta@mstarlabs.com  
**Subject:** RE: Comments on Application for PSE Energize Eastside??

Hi Karen,

Public comment received during the comment period on PSE's CUP application, including any comment received from CENSE or its attorney, will be included in the City's file that is provided to the Hearing Examiner as part of the land use process. Public comment received in connection with the EIS process and submitted during the EIS public comment period is not included as a comment in the City's file on PSE's CUP application because it was not submitted during the public comment period for the CUP. The EIS however is one of several documents the decision maker considers when making a decision on the permit application, and the Hearing Examiner will consider the Final EIS (which includes the public comments submitted during the EIS process and the responses to those public comments) when making their decision.

Hope this additional information helps. Thank you for your continued interest and involvement in this process.  
-Heidi



**Heidi M. Bedwell**  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862  
[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Kesayian <kesayian@aol.com>  
**Sent:** Tuesday, October 02, 2018 3:02 PM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Cc:** jcdemund@gmail.com; bbraun@stratery.com; jpmedley@mac.com; loretta@mstarlabs.com  
**Subject:** Comments on Application for PSE Energize Eastside??

Dear Heidi,

Although CENSE continues to maintain that the southern half of the Energize Eastside Permit Application should not be acted upon in the absence of a Permit Application for the entire project, we wish to confirm that all comments previously provided by CENSE and by individual citizens during the EIS process will be included as comments to the Permit Application and provided to the Hearing Examiner for all Administrative Hearings.

We would also like to confirm that all correspondence from CENSE counsel Rick Aramburu will also be included as comments to the Permit Application and as such will be provided to the Hearing Examiner for all Administrative Hearings.

We appreciate your confirming this or notifying us immediately if EIS comments or CENSE counsel correspondence will not be included as part of the public comments on the Permit Application.

CENSE Executive Committee

Jeanne DeMund, Barb Braun, Karen Esayian, Jan Medley

## Bedwell, Heidi

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**From:** Kesayian <kesayian@aol.com>  
**Sent:** Sunday, October 14, 2018 9:41 AM  
**To:** Bedwell, Heidi  
**Subject:** Comment for PSE CUP Application, Energize Eastside  
**Attachments:** Comments #2 DEIS.docx; Comments#2DEIS.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Having read the *Bellevue Land Use Codes* for electrical utility facilities several times, I have great respect for those who developed these guidelines for general development in Bellevue. Without a farsighted vision and elected representatives, and their staff, to insure these goals are kept, the City of Bellevue would not be where it is today.

With regard to PSE's CUP Application for the proposed Energize Eastside project, we are expecting that these Land Use Codes will be respected and followed.

- Specifically - sections of LUC 20.20.255 which stipulate that any location identified for new or expanding electrical utility facilities use the location selection hierarchy which stipulates residential areas as the last choice.
- Another section in LUC 20.20.255: requires consideration of whether the "electrical utility facility location is a consequence of needs or demands from customers located with the district or area." If the purported "need" for electrical reliability is in downtown Bellevue, that's where the "facility" should be located.

The residential districts, which total 49% of land use on the Eastside, according to the EIS, should **not** be considered for any expanded or upgraded facility. Please note, the King County records on Land Use Designation for the proposed 230kV transmission line state the percentage for single family residential use is **70.7%** and multi-family residential use **7.4%**.

- Under Decision Criteria in LUC 20.20.255 it stipulates that a "site" should be located "within the land use district requiring additional service and **residential land use districts be avoided** when the proposed new or expanded electrical utility facility serves a nonresidential land use district."
- The Conditional Use Permit Section 20.30B.140, Decision criteria refers to the City's decision making opportunities: that any "design" should be "compatible with and respond to the existing or intended character, appearance, quality of development and physical characteristics of the subject property and immediate vicinity."

Construction of industrial sized power poles with 230kV transmission lines in a residential district is NOT compatible with the intended character nor appearance of the immediate vicinity. Construction that includes "clear zones" on residential property is NOT compatible with the physical characteristics of the subject property.

The *2017 Tree Canopy Assessment* that was presented to City Council on September 24, 2018, included a graph that depicts the Somerset neighborhood as having one of the highest concentrations, 45%, of tree canopy in Bellevue, along with Bridle Trails at 48%. If the City of Bellevue is at all concerned about achieving 40% tree canopy, this project should be denied on this basis also.

I am attaching comments previously submitted for the EIS. We trust these will also be included as a comment in the City's file on PSE's CUP application.

We respectfully request the City of Bellevue honor the Land Use Codes that protect the residential districts, and residential neighborhoods, and deny this application.

We request that these concerns will be fully explored at the Administrative Hearing and that the PSE Energize Eastside project be denied.

Karen & Sam Esayian  
4601 135th Ave SE  
Bellevue, WA 98006

The following comments will address **Residential and Environmental Impacts** that are associated with the proposed PSE Alternative 1 Option A in Energize Eastside as outlined in the DEIS. Chapter 10.1 Key Findings states that "of the action alternatives, Alternative 1, Option A has the greatest potential to create significant adverse land use and housing impacts." This is a definite understatement! Chapter 6.6.3.1.1 states that with PSE preferred plan of new overhead transmission lines, the new corridor for a 230 kV line would be approximately 120-150 feet wide, wider than a 115kV line at 30-40 feet. Trees would be removed in this corridor, along with trees posing a threat to transmission lines outside the corridor. There could be up to 327 acres of vegetation and up to 131 acres of tree canopy cover removed under this option.

In addition to this, Chapter 11.6.3.5.1 states that under Alternative 1 Option A, a "**permanent clear zone** would be required." "Because the clear zone would create views of the transmission line, placing a new transmission line in a residential area.....would have a significant impact on the visual character of the area adjacent to it." In this description the greater Eastside would have an 18 mile, 150 foot wide clear zone marring and destroying the natural environment which in turn would ruin the livability of our neighborhoods.

The concern for endangered species, nesting birds, fish habitat, is noted in Chapter 6, Plants and Animals. Section 6.4.1.5 describes the forested riparian corridor and diverse fish and wildlife habitat provided by the Coal Creek Park Natural area. Cutting a **clear zone** through this Coal Creek Basin which is already **overburdened** with the Olympic Pipeline and existing overhead 115kV transmission lines would eliminate any previous positive environmental goal.

Chapter 6.6.4.2 states that with a *distributed generation component*, construction could result in only short term impacts on plants and animals. It could be added that the impact on humans (i.e. residents of neighborhoods) would also be short term using Alternative 2.

Chapter 10.7.3.1.2 acknowledges that using an existing corridor may require widening to accommodate the new utility - " up to 50 feet of additional clear zone would be needed through the corridor. This would require removal of some structures, including housing, and would reduce the availability of vacant land for additional housing..." Further stated: "*High Consequence Land Use* is a use which, if located in the vicinity of a hazardous liquid pipeline, would present an unusually high risk in the event of pipeline failure due to its function, including utilities providing regional service." The Alternative 1 A routes proposed run through residential neighborhoods and would co-locate with the Olympic Pipeline - a high pressure pipeline described in detail in Chapter 16. WHY would any governing body allow the **high consequence of pipeline failure** in addition to removal of residential homes in well maintained neighborhoods and risk the disenfranchisement of its citizens.

Chapter 11.1 - Key Findings: " Alternate 1 and 3 could cause significant impacts on views and visual resources due to vegetation removal and obstruction of scenic views. Overhead wires have the greatest potential to affect residential views. The addition of 230kV lines would have the greatest impact." Because of the hilly terrain on the Eastside and the hilly proposed PSE routes for Energize Eastside, the potential 130 foot high power poles will be seen for miles and miles - impacting more than individual neighborhoods, impacting the downtowns (Bellevue) also. The DEIS minimizes the impact on property values; there are no reports from those

involved with residential real estate. It must be remembered that the reason most of us live on the Eastside, in Bellevue in particular, is because of the "livability" - the ambiance of neighborhood character. Power poles, **130 feet in height** and potentially 3 to 6 feet in diameter at the base, belong in an industrial setting - NOT in *anyone's* neighborhood. The City of the future should be looking for 21st Century solutions for any potential electric power deficiency.

Our home for the past 40 years is in Somerset - along the easement for the PSE 115kV transmission line. The Olympic Pipeline runs down the middle of the street a half block away. We have landscaped our property to hide the view of the power poles as much as possible; this will not be possible with industrial sized poles needed for 230kV overhead transmission lines. The potential use of a route through Somerset would devastate the livability of the Somerset community. This is a community of intensely supportive and involved residents. There are other communities along the proposed PSE preferred route that could be described in the same way. It is incumbent for those making the decisions on this proposal to keep in mind the citizens they represent.

Chapter 2.3.2.2.2 describes the Alternate 1 monopoles to likely be steel or wood with a width at the base between 2-4 feet in diameter while "typical *corner and termination poles* may need to be **4-6 feet in diameter at the base.**" In the Somerset neighborhood where the current 115kV transmission lines make a turn, these PSE proposed 230kV line, 6 foot in diameter poles would be on both sides of Somerset Blvd. One or two would straddle the tennis courts on the Somerset Recreation property. This property also sits on a steep slope. It should be obvious that this potential siting rank high in residential and environmental impact.

It has been mentioned that the old 115kV transmission lines would be removed if the proposed 230kV monopole transmission lines were built, but there is **no** specific construction analysis regarding this in the DEIS.

Chapter 8.6.1.3 describes natural phenomena and acknowledges "*lightening strikes* directly to electrical infrastructure could occur" and that "transmission lines located near gas pipelines (such as in the existing corridor where PSE's 115kV transmission line co-exists with **OPLC's petroleum lines**) could pose a particular safety concern." The paragraph continues: "energized transmission lines on the ground after an *earthquake*, lightning strike....could send electric current to anything else metal in the vicinity, such as utilities (including pipelines)." (One such incident occurred early this year in the Bridle Trails area.) This scenario would definitely have a major environmental and residential impact.

The continued concern about pipeline safety is documented by Dr. Frank Cheng: *Criteria for Pipelines Co-Existing with Electric Power Lines.* (Dr. Cheng's report was submitted by Don Marsh, president of CENSE, at the March 1, 2016 DEIS Comment session in Bellevue, WA.)

Chapter 16.3.7 discusses pipeline corrosion stating that "a consequence of high-voltage power lines and buried **petroleum pipelines** sharing a corridor is that *electromagnetic interference* can be introduced on the pipelines, which can cause corrosion on the pipeline over time." "Corrosion accounts for about 23 percent of the significant failures in both hazardous liquid and gas pipelines (Baker, 2008)."

Chapter 8.5.1.3 titled Public Safety Risks, natural phenomena, only talks about an earthquake happening during construction - **not** about risks associated with 230kV power lines permanently situated in the same corridor as the Olympic Pipeline.

Chapter 8.6.1.2 titled Public Safety Risks, activities near pipelines states: "ongoing maintenance activities during operation could theoretically damage or break the **OPLC pipelines** or other pipelines in the area, leading to a chemical release or explosion...." It continues: "if transmission lines were improperly designed or located relative to pipelines, or if pipelines themselves were not properly designed with cathodic protection, pipelines could be damaged by stray electric current, leading to risk of chemical release or explosion."

Chapter 16.6.3.1.1 states that with Alternative 1 Option A (PSE's suggested plan) and if located along the existing PSE 115kV easement, construction of a 230 kV line has the potential to disrupt existing natural **gas lines or the Olympic Pipeline**. On March 9, 2016 a PSE natural gas pipeline exploded in Seattle. Jet fuel, which the Olympic Pipeline carries, is much more volatile than natural gas - it needs less oxygen and a lower temperature to ignite. The potential to disrupt is **not** an imagined consequence.

Compared with Alternative 1 A - Chapter 16.6.4.3 in describing *Distributed Generation Components*, states "there may be *minor* impacts to existing buried or overhead utilities if present."

Chapter 8.5.4.2.2 referring to **Alternative 2 Distributed Generation Component** states: "the risks during construction of distributed generation facilities would be lower than with Alternative 1 because there would be greater flexibility in location the facilities away from pipelines."

The Olympic Pipeline is mentioned throughout the DEIS, but its significance as a potential source of disaster is minimized - the conclusion being that current regulations and best practices and coordination will take care of any safety concerns. One small error will have a **major impact** on the environment and residential areas along the Eastside.

If there is no immediate pending disaster need for redundancy in the electrical system supplying Bellevue and eastside cities, as supported by the Lauckhart-Schiffmann Load Flow Study - then why are we as a City not supporting 21st Century resolutions for our electrical system. (The Lauckhart-Schiffman Load Flow Study was submitted by Don Marsh on March 1, 2016 at the DEIS Comment session in Bellevue, WA.) The **Alternative 2** options would give greater flexibility with proven technologies that can be added incrementally to meet any increased demand for electricity. These alternatives need to be studied further, by consultants with a proven track record in smart grid solutions.

Karen Esayian  
CENSE Board Member

4601 135th Ave SE  
Bellevue, WA 98006  
KEsayian@aol.com



March 9, 2016

The following comments will address **Residential and Environmental Impacts** that are associated with the proposed PSE Alternative 1 Option A in Energize Eastside as outlined in the DEIS. Chapter 10.1 Key Findings states that "of the action alternatives, Alternative 1, Option A has the greatest potential to create significant adverse land use and housing impacts." This is a definite understatement! Chapter 6.6.3.1.1 states that with PSE preferred plan of new overhead transmission lines, the new corridor for a 230 kV line would be approximately 120-150 feet wide, wider than a 115kV line at 30-40 feet. Trees would be removed in this corridor, along with trees posing a threat to transmission lines outside the corridor. There could be up to 327 acres of vegetation and up to 131 acres of tree canopy cover removed under this option.

In addition to this, Chapter 11.6.3.5.1 states that under Alternative 1 Option A, a "**permanent clear zone** would be required." "Because the clear zone would create views of the transmission line, placing a new transmission line in a residential area.....would have a significant impact on the visual character of the area adjacent to it." In this description the greater Eastside would have an 18 mile, 150 foot wide clear zone marring and destroying the natural environment which in turn would ruin the livability of our neighborhoods.

The concern for endangered species, nesting birds, fish habitat, is noted in Chapter 6, Plants and Animals. Section 6.4.1.5 describes the forested riparian corridor and diverse fish and wildlife habitat provided by the Coal Creek Park Natural area. Cutting a **clear zone** through this Coal Creek Basin which is already **overburdened** with the Olympic Pipeline and existing overhead 115kV transmission lines would eliminate any previous positive environmental goal.

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Chapter 10.7.3.1.2 acknowledges that using an existing corridor may require widening to accommodate the new utility -" up to 50 feet of additional clear zone would be needed through the corridor. This would require removal of some structures, including housing, and would reduce the availability of vacant land for additional housing..." Further stated: "*High Consequence Land Use* is a use which, if located in the vicinity of a hazardous liquid pipeline, would present an unusually high risk in the event of pipeline failure due to its function, including utilities providing regional service." The Alternative 1 A routes proposed run through residential neighborhoods and would co-locate with the Olympic Pipeline - a high pressure pipeline described in detail in Chapter 16. WHY would any governing body allow the **high consequence of pipeline failure** in addition to removal of residential homes in well maintained neighborhoods and risk the disenfranchisement of its citizens.

Chapter 11.1 - Key Findings:" Alternate 1 and 3 could cause significant impacts on views and visual resources due to vegetation removal and obstruction of scenic views. Overhead wires have the greatest potential to affect residential views. The addition of 230kV lines would have the greatest impact." Because of the hilly terrain on the Eastside and the hilly proposed PSE

routes for Energize Eastside, the potential 130 foot high power poles will be seen for miles and miles - impacting more than individual neighborhoods, impacting the downtowns (Bellevue) also. The DEIS minimizes the impact on property values; there are no reports from those involved with residential real estate. It must be remembered that the reason most of us live on the Eastside, in Bellevue in particular, is because of the "livability" - the ambiance of neighborhood character. Power poles, **130 feet in height** and potentially 3 to 6 feet in diameter at the base, belong in an industrial setting - NOT in *anyone's* neighborhood. The City of the future should be looking for 21st Century solutions for any potential electric power deficiency.

Our home for the past 40 years is in Somerset - along the easement for the PSE 115kV transmission line. The Olympic Pipeline runs down the middle of the street a half block away. We have landscaped our property to hide the view of the power poles as much as possible; this will not be possible with industrial sized poles needed for 230kV overhead transmission lines. The potential use of a route through Somerset would devastate the livability of the Somerset community. This is a community of intensely supportive and involved residents. There are other communities along the proposed PSE preferred route that could be described in the same way. It is incumbent for those making the decisions on this proposal to keep in mind the citizens they represent.

Chapter 2.3.2.2.2 describes the Alternate 1 monopoles to likely be steel or wood with a width at the base between 2-4 feet in diameter while "typical *corner and termination poles* may need to be **4-6 feet in diameter at the base.**" In the Somerset neighborhood where the current 115kV transmission lines make a turn, these PSE proposed 230kV line, 6 foot in diameter poles would be on both sides of Somerset Blvd. One or two would straddle the tennis courts on the Somerset Recreation property. This property also sits on a steep slope. It should be obvious that this potential siting ranks high in residential and environmental impact.

It has been mentioned that the old 115kV transmission lines would be removed if the proposed 230kV monopole transmission lines were built, but there is **no** specific construction analysis regarding this in the DEIS.

Chapter 8.6.1.3 describes natural phenomena and acknowledges "*lightening strikes* directly to electrical infrastructure could occur" and that "transmission lines located near gas pipelines (such as in the existing corridor where PSE's 115kV transmission line co-exists with **OPLC's petroleum lines**) could pose a particular safety concern." The paragraph continues: "energized transmission lines on the ground after an *earthquake*, lightning strike....could send electric current to anything else metal in the vicinity, such as utilities (including pipelines)." (One such incident occurred early this year in the Bridle Trails area.) This scenario would definitely have a major environmental and residential impact.

The continued concern about pipeline safety is documented by Dr. Frank Cheng: *Criteria for Pipelines Co-Existing with Electric Power Lines.* (Dr. Cheng's report was submitted by Don Marsh, president of CENSE, at the March 1, 2016 DEIS Comment session in Bellevue, WA.)

Chapter 16.3.7 discusses pipeline corrosion stating that "a consequence of high-voltage power lines and buried **petroleum pipelines** sharing a corridor is that *electromagnetic interference* can be introduced on the pipelines, which can cause corrosion on the pipeline over time." "Corrosion accounts for about 23 percent of the significant failures in both hazardous liquid and gas pipelines (Baker, 2008)."

Chapter 8.5.1.3 titled Public Safety Risks, natural phenomena, only talks about an earthquake happening during construction - **not** about risks associated with 230kV power lines permanently situated in the same corridor as the Olympic Pipeline.

Chapter 8.6.1.2 titled Public Safety Risks, activities near pipelines states: "ongoing maintenance activities during operation could theoretically damage or break the **OPLC pipelines** or other pipelines in the area, leading to a chemical release or explosion...." It continues: "if transmission lines were improperly designed or located relative to pipelines, or if pipelines themselves were not properly designed with cathodic protection, pipelines could be damaged by stray electric current, leading to risk of chemical release or explosion."

Chapter 16.6.3.1.1 states that with Alternative 1 Option A (PSE's suggested plan) and if located along the existing PSE 115kV easement, construction of a 230 kV line has the potential to disrupt existing natural **gas lines or the Olympic Pipeline**. On March 9, 2016 a PSE natural gas pipeline exploded **in Seattle**. Jet fuel, which the Olympic Pipeline carries, is much more volatile than natural gas - it needs less oxygen and a lower temperature to ignite. The potential to disrupt is **not** an imagined consequence.

Compared with Alternative 1 A - Chapter 16.6.4.3 in describing *Distributed Generation Components*, states" there may be *minor* impacts to existing buried or overhead utilities if present."

Chapter 8.5.4.2.2 referring to **Alternative 2 Distributed Generation Component** states: "the risks during construction of distributed generation facilities would be lower than with Alternative 1 because there would be greater flexibility in location the facilities away from pipelines."

The Olympic Pipeline is mentioned throughout the DEIS, but its significance as a potential source of disaster is minimized - the conclusion being that current regulations and best practices and coordination will take care of any safety concerns. One small error will have a **major impact** on the environment and residential areas along the Eastside.

If there is no immediate pending disaster need for redundancy in the electrical system supplying Bellevue and eastside cities, as supported by the Lauckhart-Schiffmann Load Flow Study - then why are we as a City not supporting 21st Century resolutions for our electrical system. (The Lauckhart-Schiffman Load Flow Study was submitted by Don Marsh on March 1, 2016 at the DEIS Comment session in Bellevue, WA.) The **Alternative 2** options would give greater flexibility with proven technologies that can be added incrementally to meet any increased demand for electricity. These alternatives need to be studied further, by consultants with a proven track record in smart grid solutions.

Karen Esayian  
CENSE Board Member

4601 135th Ave SE  
Bellevue, WA 98006  
KEsayian@aol.com

Attachments: **Figure 12b** Landslide and Seismic Hazard Areas (City of Bellevue); **Figure 16-1** Existing Electric Transmission and Natural Gas/Petroleum Pipelines (DEIS); **Property Environmental Map** - nwmaps.net (City of Bellevue); **Coal Creek Natural Area** park map.

March 9, 2016

The attached map titled Environmental property map illustrates steep slopes of 40 % plus in one section of the Somerset neighborhood. (colored in brown)

The blue squiggly line drawn down the PSE easement between 135th Ave SE and Somerset Drive SE identifies a **rain creek**. The neighbors on 135th Avenue SE have all taken care to control the rain run- off - either by digging a trench filled with rocks or bordered with railroad ties or by diverting it by other means. In extreme rain storms catching ponds retain the water - one above ground and one below. This creek starts up hill at Somerset Place and continues down to Somerset Drive. This creek has not been mentioned in the DEIS.

Karen Esayian

CENSE Board Member

4601 135th Ave SE  
Bellevue, WA 98006

KEsayian@aol.com

Attachment: Environmental map of property (City of Bellevue, nwmaps.net)

## Bedwell, Heidi

---

**From:** Adolfson, Andy  
**Sent:** Tuesday, October 23, 2018 11:04 AM  
**To:** fbosone@comcast.net  
**Cc:** Bedwell, Heidi; Ripley, Travis; Nichols, Sean  
**Subject:** Leaks and fires involving fuel (gas and liquid) pipelines

Hello Mr. Bosone,

Thank you for reaching out with your concerns regarding the Olympic Pipeline, additionally thank you for the steps you have taken in the past to prepare your family, as well as your neighbors, for events that may impact their lives. The Fire Department does it's best to prepare and protect the community, but there will always be the potential for situations that are beyond the scope of our staffing and for these rare events we urge our citizens to prepare in the manner you have.

Leaks and fires surrounding pipelines can be extremely small to horrifically disastrous. We recently saw a natural gas pipeline explosion near Prince George, in British Columbia, which could have had calamitous effects if it had been near a population center. Because the extent of a leak or fire may vary dramatically we gauge our response and actions to the incident. Believe it or not, a fire can be much more desirable than a simple leak as the fire would burn off the product at the site, while a leak may allow the product to flow to a much larger area, creating a much larger explosion/fire hazard and more environmental damage. If we are responding to a pipeline fire, often we will work to control/contain the spread of the fire, instead of trying to extinguish it, and then deal with the leak.

If we are faced with a large fire that we need to extinguish we have several options. Typically the first thing we do is assure the flow of fuel has been stopped. Simultaneously we can initiate fire attack/exposure protection and request additional resources. In most cases, if the fuel stops flowing through the pipeline, the leak stops and the fire burns itself out. Incidentally, these pipelines have sensors that detect when a leak has occurred and will automatically stop the flow of product (my use of the word 'product' refers to anything the pipeline might be carrying – gasoline, natural gas, aviation fuel, etc.).

Each of our engines carries several gallons of foam concentrate. This concentrate is mixed in with the water we pump to produce a solution that does a great job of controlling and extinguishing fuel fires. The concentration is typically about 1% to 3% so the 30 gallons of concentrate each engine carries can go a long way.

Our next major resource are foam trailers. The closest trailer comes from a fire station in Renton and could be almost anywhere in Bellevue in 15 to 20 minutes. These trailers carry the same type of foam, but in much larger quantities. Seattle Fire Department also has resources we can call in, if needed.

The next asset we would request would be Crash Fire Rescue(CFR) trucks from the local airfields. These resources are located at Renton Airport, King County Municipal Airport (off of I-5 in south Seattle) and Sea Tac Airport. We have had a couple of gasoline tanker fires over the years and, to my knowledge, we have never needed to call in these resources. If we were to request these resources, we would likely get the first CFR truck within 30 minutes, however we would be using the previously mentioned resources in the interim period.

Of course our response will also be impacted by our ability to access the incident (the B.C. explosion is so far in the woods they are building a road so they can get there and make the repairs!) and injuries that may require our more urgent attention. That said, we do have the ability to call in a great number of firefighters and paramedics from partner agencies throughout King County.

As for what citizens should do: move away from the leak. If the leak is a liquid it will pool and flow downhill, so moving up hill and away is the best answer. Leaking gasoline can have its fumes spread horizontally along the ground, but the fumes likely will not move up a hill; it will pool over the leaking fluid and/or move downhill like water flows down a slope. If the leak is natural gas, it will rise in the air and be dispersed by the wind. Natural gas has a specific gravity that is about ½ that of air, so it will rise pretty much straight up, it should not follow along the ground, up a hill.

Sheltering in place can be hazardous as a liquid leak (the liquid itself or the fumes) may propagate towards the structure you are sheltering in. Additionally natural gas will occasionally follow underground cavities and collect in structures (however this is extremely rare). Moving away about ½ mile from the incident site is the best plan. It is also wise to avoid the use of anything that will create heat or a spark when you are evacuating. The chances of this initiating an explosion is very low, but it is a hazard none the less. This means walk, don't drive (unless driving is your only option – thinking about mobility impaired individuals). Don't turn on/off lights or other equipment.

I hope I am answering the questions that concern you. Please let me know if there are any other items I can try to explain. As I stated early on, there are a lot of incidents we can handle as your Fire Department, however we can be overcome. Citizen preparedness is critical for the rare occasions where our resources are out matched. We live in earthquake country, we have some pretty good storms from time to time and certainly a pipeline incident could have a high impact on the community; we appreciate people, like you, who prepare for these extreme situations and are able to help themselves, their families and their neighbors until we can intervene.

Thank you!

Andy

**ANDY ADOLFSON**  
**DEPUTY CHIEF OF OPERATIONS**  
**CITY OF BELLEVUE (WA) FIRE DEPARTMENT**  
**AADOLFSON@BELLEVUEWA.GOV**  
**DESK: 425-452-2016**  
**MOBILE: 206-550-7463**

## Bedwell, Heidi

---

**From:** Bedwell, Heidi  
**Sent:** Monday, October 22, 2018 3:37 PM  
**To:** llopez@mstarlabs.com  
**Cc:** 'hansennp'; 'whalvrsn1@frontier.com'; 'Kesayian'  
**Subject:** RE: PSE Project Comments on the Permit

Hi Loretta,

The Final EIS, which includes the public comments submitted during the EIS comment period, will be included in the City file that is provided to the Hearing Examiner as part of the land use process. However, if you wish to make an additional specific comment on PSE's CUP application, then I strongly encourage you to re-submit those comments during the public comment period for the CUP (either in writing, at the public hearing, or both). Although any EIS-related comments you may have submitted during the EIS comment period would have been included in the Final EIS, City staff does not go back to the Final EIS and re-submit those comments by request. Therefore, if you believe that comments you submitted on the EIS should be considered during the land use permit process and should be included in the City file independent of the Final EIS, then you should re-submit those comments during the time period when the record remains open. Your additional comments provided below are noted as well.

Regarding the hearing date, you are correct in understanding that we would not hold a hearing less than 21 calendar days after issuing our notice of recommendation. I'm not sure if I've mentioned this before but because we notice on Thursday's therefore a hearing is typically held on a Thursday evening. Since we are still waiting for additional information from PSE and reviewing their submitted documents we do not have a specific date for a public hearing. As you know, CENSE's attorney has notified the city about his availability in December and the city has confirmed we will not be holding the public hearing during those dates where he is unavailable. As soon as we know a date of the hearing I will share it with you.

-Heidi



**Heidi M. Bedwell**

Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Loretta Lopez <llopez@mstarlabs.com>  
**Sent:** Wednesday, October 17, 2018 8:46 PM  
**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>  
**Cc:** Norm Hansen <Hansennp@aol.com>; Warren Halverson <whalvrsn1@frontier.com>; kesayian@aol.com  
**Subject:** PSE Project Comments on the Permit

Heidi,



I submitted many comments on behalf of the Bridle Trails Community Club on both Phase I and Phase 2 of the EIS for PSE project. Please incorporate all of my comments on the EIS into the permit application proceeding.

Please note that the City did not adequately address the questions that I raised in the EIS process.

Also, please note that throughout the EIS process that PSE did not prove that there is a need for the project. Now in this phase of the process, PSE must prove need in order for the City to allow a permit.

Further, we object to the City proceeding on the PSE application for half of the project. The City should not proceed until PSE has filed for application for the entire project. The City lead residents to believe that the PSE project was one project. It is not acceptable to allow PSE to decide to divide the project into 2 projects at this late date.

Thank you.

Loretta  
VP Bridle Trails Community Club

P.S. We do need to know the date of the hearing. As I recall you stated that the Hearing would be 21 days after the City issues its recommendation. If the City issues a recommendation tomorrow then 21 calendar days is November 9. Is the 21 day period calendar days or business days?

## Bedwell, Heidi

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**From:** Margaret Moore <mmooreii@comcast.net>  
**Sent:** Monday, October 15, 2018 2:25 PM  
**To:** Bedwell, Heidi  
**Subject:** PSE Project

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Bedwell,

I am writing to request that PSE's CUP application be denied. The project itself is suspect in several aspects which have been thoroughly documented by CENSE and many other citizens. I am particularly concerned about the negative impact on neighborhood safety and security, environmental quality and the questionable need for this electrical capacity increase designed to enrich foreign investors at the expense of current and future rate payers. That is just not fair and is an injustice to the citizens of Bellevue and other eastside communities.

In addition, I have learned that the project appears to violate Bellevue Land Use Codes, specifically LUC 20.20.255 and 20.30B.140. The general context of these codes is:

- the location hierarchy for new or expanded electrical facilities stipulates that residential areas are the *last* choice to be considered.
- the site chosen should be located within the land use district requiring additional service and residential land use districts to be avoided. (The expressed need for electrical reliability is in downtown Bellevue - that's where any new or expanded facility should be placed.)
- The project as proposed is not "*compatible with nor responds to the existing or intended character, appearance, quality of development and physical characteristics of the subject property and immediate vicinity.*"

As you can see, the immediate impact on the environment and financial interests of residential communities must be considered first and future power installations placed where the need exists – in the downtown area, if at all. The need for this additional power is questionable, based upon a number of local studies and data provided by neighboring municipalities, including Seattle. We can do better than stringing heavy-duty power lines through neighborhoods at the expense of the users to benefit foreign interests.

I appreciate your interest in protecting our neighborhoods,

Margaret R. Moore

4707 135<sup>th</sup> PL SE

Bellevue, WA 98006

mmooreii@comcast.net

## Bedwell, Heidi

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**From:** Richard Lauckhart <lauckjr@hotmail.com>  
**Sent:** Sunday, October 14, 2018 9:38 AM  
**To:** Bedwell, Heidi; Dave Van De Weghe; jding@rentonwa.gov  
**Subject:** PSE need to show their justification for Energize Eastside before your cities hold hearings on the project  
**Attachments:** Lauckhart evidence that there is no proof of the need for Energize Eastside with attachments.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Heidi, Dave and Jill-

Please include this email and its attachment in your respective city files on the PSE CUP Application for Energize Eastside.

The attachment to this email demonstrates that PSE has inappropriately refused to provide the data they claim demonstrates the need for Energize Eastside. That refusal is not acceptable. Without that information interested parties such as myself can not examine and question the need for Energize Eastside. Without providing that information, PSE has not met the burden of proving that Energize Eastside is needed.

In the attachment I describe the efforts I have made in the last few years to get this information and PSE's refusal to provide it. PSE has no legitimate reason for denying my requests for this information.

In the attachment I state that if PSE refuses to provide this information and make it available for stakeholders prior to your hearings on the CUP Application for Energize Eastside, then your cities should refuse to hold any hearing on their CUP Application and/or your city should simply deny the permit.

Richard Lauckhart  
Energy Consultant  
44475 Clubhouse Drive  
Davis, Ca 95618  
916-769-6704

Comments by Lauckhart re PSE lack of proof of the need for Energize Eastside

Oct 14, 2018

On Sept 18, 2018 I provided to each of the cities of Bellevue, Newcastle and Renton my expert report demonstrating that there is No Need for Energize Eastside. On page 4 of that report I stated as follows:

*"PSE refused to let me see the inputs and outputs of load flow studies performed by Quanta. In my opinion, by refusing to make this information available for inspection, PSE has not demonstrated the need for Energize Eastside."*

**In these comments I am asking that the cities of Bellevue, Newcastle and Renton demand that PSE provide the inputs and outputs of the studies performed by Quanta that are the basis of PSE's claim that Energize Eastside is needed.** Without that information being available for your hearing for the CUP Application for Energize Eastside, there is no legitimate evidence on the record that Energize Eastside is needed.

**Without that information being provided by PSE there should either be no hearing at all on the CUP Applications or the Applications should simply be denied due to a lack of demonstration of the need.**

The History of my attempt to get this information is as follows:

1) On Sept 2, 2015 I filled out the PSE form they claim is needed for me to request the information needed for me to examine the basis for the allegation that Energize Eastside is needed. PSE requires requestors to state the need for the information. I stated that I needed the information *"To allow a meaningful participation in review of the need for Energize Eastside."* See Attached request to PSE dated Sept 2, 2015. PSE denied my request because they said I did not to perform such a review because others had already confirmed the need for Energize Eastside. But others did not provide me their studies. And it is the PSE studies that are supposed to demonstrate the need for Energize Eastside. To reject my ability to review the studies is tantamount to saying that an accused party does not get to see the evidence against them.

Because PSE refused to show me their studies, I acquired the PSE Base Case load flow studies from FERC and did my own study with the help of my colleague Roger Schiffman. See the Lauckhartl-Schiffman study already provided to your three cities in your CUP Application proceeding. As can be seen from the Lauckhart-Schiffman study, we were unable to duplicate what PSE/Quanta said happened in their load flow studies. So I wanted to see the PSE/Quanta load flow studies to see how their data inputs and outputs varied from the studies that Schiffman and I had performed.

2) So on February 21, 2016 I once again made the request for the information I needed, but this time I stated I needed to see the details of their load flow studies in order to see how their studies might have been made to work since the Lauckhart-Schiffman studies could not duplicate what they said their studies showed. See Attached request dated Feb 21,2015. Once again, PSE refused to give me the requested information.



In order to understand the PSE/Quanta load flow work, there is specific information that they would need to provide. It is the information that I requested in my Sept 2, 2015 request and my Feb 21, 2016 requests. Your three cities need to demand that PSE provide the specific requested information. That specific information is:

**The load flow studies and data inputs/results that PSE and/or Quanta ran to determine the need for the Energize Eastside project (EE) to provide reliable power supply to the "Eastside." In particular the following load flow inputs and studies:**

1. The study PSE and/or Quanta did for the year 2018 (or similar timeframe) without the EE project in service and all facilities in service (i.e. N-0).
2. All the contingency studies PSE/Quanta did for the year 2018 (or similar timeframe) without the EE project in service in which there were contingency outages of elements of the grid (e.g. the N-1 and N-2 studies or any other contingency studies used to determine the need for the EE line).
3. The study for the year 2018 (or similar timeframe) with the EE line in service and all facilities in service (i.e. N-0)
4. All the contingency studies for the year 2018 (or similar timeframe) with the EE project in service with contingency outages of elements of the grid (e.g. the N-1 and N-1-1 studies, or any other contingency studies used to determine the need for the EE line).

All files associated with each load flow run requested above. These files would include at a minimum:

1. areatie.lst
2. buslist.lst
3. flows.lst
4. owner.lst
5. summary.lst
6. .raw file

In addition to the load flow data demand that PSE provide loading on Eastside substations. Specifically the following data for each of the last 6 years:

- 1) For the five highest peak load days on the PSE total system, please provide the one hour total system peak load on those days and the hour on which that peak occurred.
- 2) Then for those system peak load hours, please provide the one hour peak load on each of the substations in the Eastside.

This would result in 5 peak loads on each Eastside substation for each of the 6 historical years.

The Cities of Bellevue, Newcastle and Redmond need to demand that PSE provide the information identified above. If PSE refuses to provide this information, then each city **should either decide there will be no hearing at all on the CUP Applications or the Applications should simply be denied due to a lack of demonstration of the need.**

SUBMIT SIGNED ORIGINAL CEII REQUEST FORM TO:

Puget Sound Energy, Inc.  
355 110th Avenue NE, EST-06E  
P.O. Box 97034 EST-06E  
Bellevue WA 98009-9734

Attn: Manager, Transmission Contracts--CEII Request

Name of Requester:

RICHARD LAUCKHART

Requester's street address and phone number:

44475 CLUBHOUSE DR.  
EL MACERO, CA. 95618 530-759-9390

Name of individual submitting request on behalf of Requester:

RICHARD LAUCKHART

Phone number and e-mail address of individual submitting request on behalf of Requester:

530-759-9390  
LAUCKTR@HOTMAIL.COM

Description of information requested:

SEE ATTACHED

Statement explaining need for requested information and use to be made of requested information:

ALLOW MEANINGFUL PARTICIPATION IN  
REVIEW OF NEED FOR ENERGIZE EASTSIDE

Is the Requester willing to sign and abide by an appropriate agreement limiting the Requester's use and disclosure of the information requested?

Yes



No



Requester:

*Richard Lauckhart*

By RICHARD LAUCKHART

Title ENERGY CONSULTANT

Date:

SEPT 2, 2015



I request the load flow studies and data inputs/results that PSE and/or Quanta ran to determine the need for the Energize Eastside project (EE) to provide reliable power supply to the "Eastside." In particular I request the following load flow inputs and studies:

1. The study PSE and/or Quanta did for the year 2018 (or similar timeframe) without the EE project in service and all facilities in service (i.e. N-0).
2. All the contingency studies PSE/Quanta did for the year 2018 (or similar timeframe) without the EE project in service in which there were contingency outages of elements of the grid (e.g. the N-1 and N-2 studies or any other contingency studies used to determine the need for the EE line).
3. The study for the year 2018 (or similar timeframe) with the EE line in service and all facilities in service (i.e. N-0)
4. All the contingency studies for the year 2018 (or similar timeframe) with the EE project in service with contingency outages of elements of the grid (e.g. the N-1 and N-1-1 studies, or any other contingency studies used to determine the need for the EE line).

I request all files associated with each load flow run requested above. These files would include at a minimum:

1. areatie.lst
2. buslist.lst
3. flows.lst
4. owner.lst
5. summary.lst

In addition to the load flow data I request historical loading on Eastside substations. Specifically I request the following data **for each of the last 6 years**:

- 1) For the five highest peak load days on the PSE total system, please provide the one hour total system peak load on those days and the hour on which that peak occurred.
- 2) Then for those system peak load hours, please provide the one hour peak load on each of the substations in the Eastside.

This would result in 5 peak loads on each Eastside substation for each of the 6 historical years.



## New/Revised CEII request from Richard Lauckhart

Richard

Sun 2/21/2016, 5:32 PM

To: jens.nedrud@pse.com <jens.nedrud@pse.com>; Keri.Pravitz@pse.com <keri.pravitz@pse.com>; energizeeastside@pse.com <energizeeastside@pse.com>  
Cc: Don Marsh <don.m.marsh@hotmail.com>

 1 attachments (22 KB)

CE15-130\_Lauckhart\_Letter of Release Copy.pdf;

Jens and Keri-

I am making a new/revised CEII Request related to the load flow studies PSE performed regarding the Energize Eastside (EE) project. The specific request is for:

The study PSE and/or Quanta did for the year 2018 (or similar timeframe) without the EE project in service and all facilities in service (i.e. N-0).

All the contingency studies PSE/Quanta did for the year 2018 (or similar timeframe) without the EE project in service in which there were contingency outages of elements of the grid (e.g. the N-1 and N-2 studies or any other contingency studies used to determine the need for the EE line).

The study for the year 2018 (or similar timeframe) with the EE line in service and all facilities in service (i.e. N-0)  
All the contingency studies for the year 2018 (or similar timeframe) with the EE project in service with contingency outages of elements of the grid (e.g. the N-1 and N-1-1 studies, or any other contingency studies used to determine the need for the EE line).

I request all files associated with each load flow run requested above. These files would include at a minimum:

areatie.lst

buslist.lst

flows.lst

owner.lst

summary.lst

.raw file

As you should be aware, a colleague of mine and I have run loadflows on these cases ourselves starting with the WECC Heavy Winter 2018 Base Case. Our results differ from the PSE results. While you told me on November 19 of last year that PSE uses the WECC Base Cases, it is apparent from your Eastside Needs Assessment Report and the Base Case I got from WECC that PSE has modified the WECC Base Case in several ways. In our report we have speculated about what changes you made to the WECC Base Case and why the PSE results were different. We believe our results are more defensible than the PSE results. But we need these files from the PSE load flow runs in order to perform a proper comparison.

As a side note, the last time I requested this information you told me that you would not be providing the files because in your view I did not have a legitimate need for the data. However, when I asked FERC for the PSE Base Case files saying I needed the files to examine the need for Energize Eastside,

FERC approved my request and said my need was a legitimate need. I am attaching FERC's approval letter to this request for your information.

In addition to the load flow data I would like to get historical loading on each of the 230/115 KV substations you consider to be on the Eastside as well as each of the 115/12 KV substations you consider to be on the Eastside. Specifically I request the following data for each of the last 6 years:

For the five highest peak load days on the PSE total system, please provide the one hour total system peak load on those days and the hour on which that peak occurred. Then for those system peak load hours, please provide the one hour peak load on each of the 230/115 KV and 115/12 KV substations in the Eastside. This would result in 5 peak loads on each Eastside substation for each of the 6 historical years.

Thank you for your attention to this matter.

Feel free to call me if you have questions.

Richard Lauckhart  
44475 Clubhouse Dr  
El Macero, Ca 95618  
916-769-6704

## Bedwell, Heidi

---

**From:** Rick Aramburu <rick@aramburu-eustis.com>  
**Sent:** Thursday, October 04, 2018 12:56 PM  
**To:** Bedwell, Heidi  
**Subject:** South Bellevue Segment Energize Eastside - Response to Technical Review Letter, Part 1 (September 21, 2018)

Heidi:

We received notice earlier this week that PSE has provided responses to your August 14, 2018 letter requesting additional information. That letter, signed by Brad Strauch, Senior Planner, is dated September 21, 2018, some five week after your request.

In your August 14 letter you asked PSE to provide specific information regarding peak demand (expressed in terms of hourly demand), data on causes of higher demand in 2017, flows across the Northern Intertie, output of PSE's northern power plants and higher rate of grown during the winter 2017. Essentially, PSE, in its September 21 letter, has refused to answer any of these questions and has refused to provide any actual data as requested by the City. The City questions in its August 14 letter were reasonable in evaluating whether the proposal meets the standards of city codes, especially the fundamentals of LUC 20.20.255. PSE's imperious attitude in brushing off the City requests should not be tolerated.

The City should not proceed to consider the PSE application until these questions are fully and completely answered. This is PSE's application and it has the burden to prove consistency with Bellevue code provisions. It cannot hide from public view essential information and data regarding its operations, which are at the heart of need and reliability criteria in the code.

Thank you for your attention to this important issue.

Rick

J. Richard Aramburu

ARAMBURU & EUSTIS, LLP

720 Third Avenue

Pacific Building Suite **2000**

Seattle, WA 98104-1860

Telephone (206) 625-9515

Facsimile (206) 682-1376

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

## Bedwell, Heidi

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**From:** Rick Aramburu <rick@aramburu-eustis.com>  
**Sent:** Thursday, October 18, 2018 7:45 AM  
**To:** Bedwell, Heidi  
**Subject:** RE: City review of PSE's 230 kV proposal (south Segment)

Heidi:

Thank for the courtesies regarding the hearing date.

CENSE is also awaiting information from PSE relative to electrical consumption within the Bellevue service area. This information is essential in evaluating the proposal under the criteria of LUC 20.20.255.E, the "Decision Criteria" for applications for new transmission. This section requires that PSE "demonstrate that an operational need exists that requires the location or expansion at the proposed site" (Subsection 3) and also "demonstrate that the proposed electrical utility facilities improves reliability to the customers served and reliability of the system as a whole. . ." (Subsection 4).

Rick

J. Richard Aramburu  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue  
Pacific Building Suite **2000**  
Seattle, WA 98104-1860  
Telephone (206) 625-9515  
Facsimile (206) 682-1376

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

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**From:** Bedwell, Heidi [mailto:HBedwell@bellevuewa.gov]  
**Sent:** Thursday, October 18, 2018 7:16 AM  
**To:** Rick Aramburu  
**Subject:** RE: City review of PSE's 230 kV proposal (south Segment)

Mr. Aramburu,

We are still waiting for additional information from PSE in response to our August comment letter. When the documents have been received these will also be uploaded to the project permit page. You will be able to access the documents [here](#).

We did forward your letter to the PSE permit contact and we have asked some follow-up questions as well. We are still waiting for a response to our communication.

Finally, we appreciate the notification about your availability in the month of December. We are still assessing the timing of the hearing relative to a potential notice of director's recommendation. However, this email confirms that the City will not schedule a hearing during the time you will be out of the office (December 4-15).

-Heidi





**Heidi M. Bedwell**

Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

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**From:** Rick Aramburu <[rick@aramburu-eustis.com](mailto:rick@aramburu-eustis.com)>  
**Sent:** Friday, October 12, 2018 2:09 PM  
**To:** Bedwell, Heidi <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Cc:** Loretta Lopez <[loretta@mstarlabs.com](mailto:loretta@mstarlabs.com)>; 'Karen Esayian' <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Subject:** City review of PSE's 230 kV proposal (south Segment)

Heidi:

I have been forwarded your email below. Can you provide an update on whether you are still awaiting this specific material? Can you provide us with the additional material when received?

In addition, I asked in an October 4 email to that the city require that PSE answer the questions concerning peak demand on the system which was the subject of your August 14, 2018 letter. Have you asked for this information and, if so, what was the PSE response?

I will be out of the office from **December 4 through December 15** so I request hearings not be held during this period.

Thank you.

Rick

**From:** "Bedwell, Heidi" <[HBedwell@bellevuewa.gov](mailto:HBedwell@bellevuewa.gov)>  
**Date:** October 4, 2018 at 10:21:38 AM PDT  
**To:** Karen Esayian <[kesayian@aol.com](mailto:kesayian@aol.com)>  
**Cc:** "[llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)" <[llopez@mstarlabs.com](mailto:llopez@mstarlabs.com)>  
**Subject:** RE: Are all questions answered with PSE's 9/21 EE updates?

I am still reviewing the submitted documents as well as waiting for two specific responses: vegetation management and critical areas mitigation. Once I have received all information and completed my review I'll have a better sense if we'll be asking for more information.

Heidi

J. Richard Aramburu

ARAMBURU & EUSTIS, LLP

720 Third Avenue

Pacific Building Suite **2000**

Seattle, WA 98104-1860

Telephone (206) 625-9515

Facsimile (206) 682-1376

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

## Bedwell, Heidi

---

**From:** Carol <carol@aramburu-eustis.com>  
**Sent:** Monday, October 15, 2018 3:41 PM  
**To:** Steve Osguthorpe  
**Cc:** Bedwell, Heidi; Jennifer Henning; Rick  
**Subject:** PSE EE segmentation  
**Attachments:** 2018-10-15 to Newcastle re segmentation.pdf; 2018-3-9 Bellevue-permit bifurcation.pdf; 2018-1-17 CENSE re PSE Segmentation.pdf; 2018-1-17 Att2 2018-1-9 Bedwell (FEIS).pdf; 2018-1-17 Att1 2017-8-31 re bifurc.pdf; 2017-8-31 CENSE comment re bifurcation.pdf

Mr. Osguthorpe, Please see the attached letter of today's date from Mr. Aramburu with CENSE comments on PSE's proposal.

Carol Cohoe, Legal Assistant  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue, SUITE 2000  
Seattle, WA 98104  
(206) 625-9515

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

Cc:  
Heidi Bedwell, City of Bellevue  
Jennifer Henning, City of Renton

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

J. Richard Aramburu  
rick@aramburu-eustis.com  
Jeffrey M. Eustis  
eustis@aramburu-eustis.com

720 Third Avenue, Suite 2000  
Seattle, WA 98104  
Tel 206.625.9515  
Fax 206.682.1376  
www.aramburu-eustis.com

October 15, 2018

Mr. Steve Osguthorpe  
Community Development Director  
City of Newcastle  
12835 Newcastle Way, Suite 200  
Newcastle, WA 98056

Via Email:  
steveo@newcastlewa.gov

Re: Segmentation of Proposed PSE Transmission Line

Dear Mr. Osguthorpe:

On August 31, 2017, January 17, 2018, and March 9, 2018, I wrote you on behalf of CENSE concerning permitting for PSE's transmission line project through Newcastle, Bellevue and Renton. This correspondence objected to PSE's proposal to divide their project into two parts for permitting in the City of Bellevue. Copies of my letters are attached hereto for your ready reference.

As our previous correspondence described, this transmission line has always been considered a single project for environmental review and permitting. Our letter of August 31, 2017 included statements from the PSE website from early August, 2017, stating that: "We anticipate submitting permits for the northern portion later this year (2017)." Now, nearly 15 months after promises by PSE that north segment permits would be forthcoming by the end of 2017, no permit applications have been submitted and PSE has refused to provide a permit timetable for the north segment. Meanwhile, PSE continues to push for a hearing on only the south segment as soon as November, 2018.

It has become apparent that PSE's extended delay in providing a complete application for its project is a strategic move, unrelated to preparation of project plans. No review or hearings should be held until applications for the whole project have been submitted. In addition, recent information provided by the Washington Utilities and Transportation Commission (WUTC) also indicates the need to review the entire project as a whole, not in two artificial segments. In WUTC comments on the 2017 PSE Integrated



Resource Plan (IRP), the Commission singled out the "Energize Eastside" project. Among other comments, the WUTC stated, page 9, as follows:

The Company complied with the letter of the law in Chapter 8 where it provided a history of its Needs Assessment Reports. However, the Plan did not answer many questions that are needed for determining if the Company's conclusions are justified. For instance, 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.

(Emphasis supplied.) But PSE has specifically refused to engage in the "joint utility analysis" of all options to resolve transmission problems. It has become obvious that PSE's relentless push to have local governments consider only half of its project is a part of the continuing effort to avoid consideration of available alternatives for the project as a whole. A "joint utility analysis" certainly may demonstrate that no new transmission lines are warranted in Newcastle and parts of Bellevue and Renton.

Local codes acknowledge the need for and require comprehensive review of the entire project. For Newcastle, the "Energize Eastside" project is governed by NMC 18.44.052, which requires consideration of

"three alternative site options located within or outside Newcastle's city limits that will meet the system needs for the proposed new or expanding utility facility."

NMC 18.44.052.A (emphasis supplied). Subsection A.4.c specifically requires a description of how the proposal "relates to system reliability." Half a project does not contribute to "system reliability." Subsection C.6 specifically requires that PSE:

shall demonstrate that the proposed utility facility – regional improves reliability to the customers served and reliability of the system as a whole, as certified by the applicant's licensed engineer;

(Emphasis supplied). See also Subsection A. The "reliability of the system" as a whole is not enhanced or improved by half a line. The City of Newcastle cannot determine compliance with its own code requirements without a complete application showing the entire project.

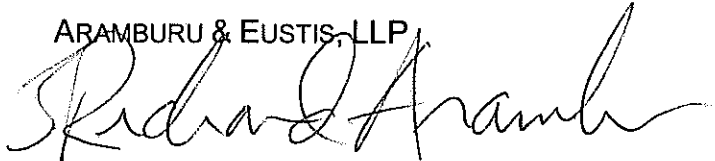
As requested in our August 31, 2017, January 17, 2018, and March 9, 2018, letters the City should not succumb to the PSE segmentation strategy to "divide and conquer." The City should require that hearings be held only on the entire project, not just one segment. We copy the Cities of Bellevue and Renton on this letter, as all of the concerns discussed here apply to their review as well.

October 15, 2018  
Page 3

Thank you for your consideration of our views.

Sincerely,

ARAMBURU & EUSTIS, LLP

A handwritten signature in black ink, appearing to read "Richard Aramburu". The signature is written in a cursive style with a large, prominent initial "R".

J. Richard Aramburu

JRA:cc

cc: CENSE  
Heidi Bedwell, City of Bellevue  
Jennifer Henning, Planning Director, City of Renton

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

J. Richard Aramburu  
rick@aramburu-eustis.com  
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March 9, 2018

Heidi M. Bedwell  
Environmental Planning Manager  
City of Bellevue  
PO Box 90012  
Bellevue WA 98009-9012

Via Email:  
HBedwell@bellevuewa.gov

Mike Brennan  
Director of Development Services  
City of Bellevue  
PO Box 90012  
Bellevue WA 98009-9012

Via Email:  
MBrennan@bellevuewa.gov

Re: Segmentation of Proposed PSE Transmission in City of Bellevue

Dear Ms. Bedwell and Mr. Brennan:

On August 31, 2017 and January 17, 2018, I wrote to the city on behalf of CENSE concerning permitting for PSE's transmission line project through Bellevue. This correspondence objected to PSE's proposal to divide their project into two parts for permitting in the City of Bellevue. Copies of my letters are attached hereto for your ready reference.

As our previous correspondence described, this transmission line project, 9 miles of which is in the City of Bellevue, has always been considered a single project for environmental review and permitting. However, PSE has now filed a permit application for just the southern segment of the proposal (to the Lakeside substation) and is holding off on the application for the northern segment.

Your response to our correspondence, in an email dated January 30, 2018, provided no substantive response to our concerns about PSE's segmentation of the project, but did provide us with a date for the issuance of the FEIS for this proposal.

The FEIS has now been issued, a lengthy document consisting of nearly 5,000 pages.

Public Comments are still being received by Bellevue. Given the size of the document, clearly the public will require additional time for permit review. However, a cursory review of the FEIS indicates no substantial justification for the arbitrary division of the project into two parts for review. Indeed, we have just received (March 6, 2018) the "Notice of Availability of Final Environmental Impact Statement" which describes 16-18 miles of electrical transmission lines, but gives no indication that this proposal will be segmented for permitting. Certainly the section on alternatives does not discuss building just one part of the project.

We understand that the potential construction of this linear facility will involve beginning at one place and staging construction in a sequential and continuous manner. However, this is distinct from the permitting of the facility, where there is no independent utility of construction of half the line. This is especially true under Bellevue's electrical utility facility in Section 20.20.255, when the code focuses on the need for the facility, its contribution to reliability and other systemic features. LUC 20.220.255.2.c.i requires the applicant to "describe whether the electrical utility facility is a consequence of needs or demands from customers located within the district or area." It is abundantly clear that the installation of the south segment is not a consequence of the residents near this line; the "need or demands," if any, are in downtown Bellevue and adjacent areas, which are in PSE's "north segment". Indeed, the Phase 1 DEIS did consider system need and alternatives, but never discussed the possibility of only building a part of the line.

In addition, are we to seriously believe that PSE would build the south segment and then stop at the Lakeside substation, at a cost of \$100,000,000+? Is it not the case that the approval of the south segment, with less impact than the entire eighteen mile line, will place substantial coercion on the Hearing Examiner and the City Council to approve the north segment? Won't the Hearing Examiner, the East Bellevue Community Council and the City Council have additional coercion placed on them to approve the north segment, even if it is violative of BMC 20.20.255, because it would cause PSE to waste considerable money on the south segment, which would then become a transmission line to nowhere?

In addition to the electric system issues, the proposed bifurcation poses procedural issues as well. These are discussed in our prior correspondence. Will the need for the project be determined in a proceeding on just the south segment of the facility, which does not connect to the north? Will the City be considering limiting the project to the south segment and determining no additional work will be permitted to the north? Is the staff seriously asking Bellevue residents to endure two sets of hearings, and two separate considerations by the City Council just to please PSE? Is this proposal an attempt to dilute opposition by separate consideration of segments north and south of the Lakeview substation? Because the proposal runs through the jurisdiction of the East Bellevue Community Council, and their approval of the conditional use permit is required, will review of the south segment be a Process I or Process III, the latter

March 9, 2018  
Page 3

required when EBCC has jurisdiction? The proposition to segment a single transmission line project into two parts makes no technical, electrical or procedural sense.

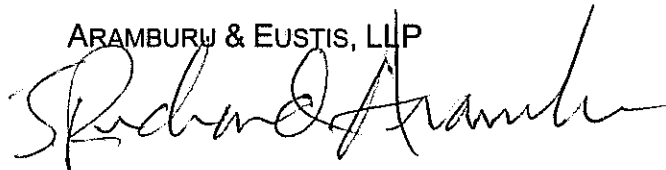
When the original bifurcation proposal was made by PSE, it indicated that the application for the northern segment would be submitted in later 2018. However, recent information from Carol Helland (an email of February 23, 2018) indicates that PSE anticipates the application for that segment will be made by late spring or early summer, less than three months away. Given these circumstances, no logical reason supports PSE's proposed segmentation into north and south segments. The delay of just a few weeks is a small part of the overall project consideration that stretches back to the fall of 2014.

The unfairness of PSE's proposed bifurcation cannot be remedied by later review by the Courts. It is incumbent on the staff to act now to assure that only a single hearing be held on this single project and the public interest be protected. A notice should be circulated to the community that review of the "Energize Eastside" proposal will be at a single hearing to be held following the submission of application materials for the entire project.

Because of the importance of this issue, we ask you to provide your response to this letter as soon as possible, but not later than March 16, 2018.

Sincerely,

ARAMBURU & EUSTIS, LLP

A handwritten signature in black ink, appearing to read "Richard Aramburu", written over the typed name below.

J. Richard Aramburu

JRA:cc  
cc: CENSE

DSD 011832

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

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rick@aramburu-eustis.com  
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January 17, 2018

Carol Helland  
Development Services Land Use Director  
City of Bellevue  
P.O. Box 90012  
Bellevue 98009

Via Email:  
CHelland@BellevueWA.gov

Heidi Bedwell  
Energize Eastside EIS Program Manager  
450 110th Ave. NE  
P.O. Box 90012  
Bellevue, WA 98009

Via Email:  
HBedwell@bellevuewa.gov  
info@EnergizeEastsideEIS.org

Steve Osguthorpe, AICP  
Community Development Director  
City of NewCastle  
12835 Newcastle Way, Suite 200  
Newcastle, WA 98056

Via Email:  
SteveO@NewcastleWA.gov

Jennifer Henning  
Planning Director  
Renton City Hall  
1055 S. Grady Way  
Renton, WA 98057

Via Email:  
JHenning@RentonWA.gov

Re: PSE SEGMENTATION OF PROPOSED TRANSMISSION LINE ("ENERGIZE EASTSIDE") FOR REVIEW

Dear Mmes Helland, Bedwell, Henning and M. Osguthorpe,

As you know, I represent the Coalition of Eastside Neighbors for Sensible Energy (CENSE). CENSE has been an active participant in review and comment on PSE'S proposed eighteen mile 230 kV transmission line from the time the project was announced in December, 2013.

More recently, we corresponded with you in a letter dated August 31, 2017, regarding the proposed bifurcation of this project into several segments for purposes of review and permitting. That letter is attached for your ready review (Attachment 1). No response was received to this correspondence.

Within the past month, we inquired as to when the Final Environmental Impact Statement would be issued for the project; the City's lengthy email response is attached (Attachment 2). In that email, Ms. Bedwell indicated that the FEIS will likely be available on or about March 1, stating:

*Please note that we are in the active permit review phase (in both Bellevue and Newcastle), and I again encourage anyone who is interested in this project to focus their comments on the permit applications that have been submitted to the partner jurisdictions as well as the City of Bellevue.*

Later in the email is the following recommendation:

*In order to limit confusion, and because the comment period on the DEIS has long since passed, it is best to direct comments and review at this time to the permit application materials. The City recommends that interested parties submit comments on the permits early in the permitting process, rather than waiting to comment until after the FEIS is available. This of course does not preclude you or your clients from submitting additional comments at the public hearing on the permit applications.*

It appears that the City is pushing local residents to submit comments on permit applications, even before the FEIS is available. However, at this point the only complete application filed for the Energize Eastside project is for the "Bellevue South Segment," which is only 5 miles of the 18 mile project. No permits have been filed for the Bellevue Central Segment (3 to 5 miles), the Bellevue North Segment (2.2 miles), the Redmond Segment (2 miles) or the Renton Segment (4 miles). A permit application has been filed for the 1.5 mile Newcastle Segment, but the City has determined that permit application is incomplete and not ripe for comment.

As we described in our August 31 letter, there is nothing to indicate that functionally the "Energize Eastside" proposal is anything other than, as described in the DEIS's, a single project "to connect two existing bulk energy systems (one to the north in Redmond and one to the south in Renton), supply future electrical capacity and improve electrical grid reliability for Eastside communities." This is the second sentence on the first page of the Phase 2 DEIS and the subject of paragraph 2 on page 1-7 of the Phase I DEIS. Since the FEIS is not yet complete, the CENSE members and other interested members of the public do not know if this statement will be changed. Of course, Bellevue staff knows what will be in the FEIS because they, with PSE, are

writing the document.

As we stated in our earlier letter, there is no reason to proceed to staff review, have staff recommendations, a public hearing and City Council review on a single isolated segment (only 28%) of a larger system. Indeed, though PSE seems to say there is some independent utility to the South Bellevue segment, it does not connect to any substation. The Talbot Hill Substation, the southern substation mentioned in the DEIS, is at the end of the Renton Segment, four miles from Newcastle. As we noted above, no permit application has been filed in Renton.

CENSE members have directly asked PSE when there would be permit applications for the other segments of "Energize Eastside." In an email received from Keri Pravitz, PSE's "Community Projects Manager" on January 12, 2018, Ms. Pravitz states:

Thanks for the email. We will submit our Renton permit application soon and then North Bellevue and Redmond will follow.

With the additional permit applications coming "soon," there is no basis to proceed with permit review on the isolated, orphan South Bellevue Segment until applications have been filed for all other segments. This is especially true where that segment has no independent utility. In addition, in Bellevue, if the bifurcation and segmentation continue, CENSE and other local residents will be forced to attend two or more hearings on what is a single project.

We understand and appreciate that PSE may desire to construct the project in two different phases if permitted, but that is no reason to divide the review process for the project into two different segments.

In fact, it appears that PSE is deliberately attempting to manipulate the hearing process for its own benefit. As you are aware, the PSE proposal requires a conditional use permit under the code and compliance with the specific criteria for Electrical Utility Facilities under 20.20.255. Under BMC 20.35.015.B, a conditional use is a Process I decision which is a "quasi-judicial decision made by the Hearing Examiner." However, a conditional use decision becomes a Process III decision under BMC 20.35.015.D.2 for "projects subject to the jurisdiction of a Community Council pursuant to RCW 35.14.040; . . ." As you are aware, PSE's preferred route is through an area subject to the jurisdiction of the East Bellevue Community Council, thus requiring a Process III decision. In an email to CENSE from Carol Helland dated June 3, 2015, this distinction was fully recognized:

*EBCC jurisdiction has authority only to approve or disapprove applications within the jurisdiction of the Community Council. Refer to LUC section 20.35.365. The determination is made at the time of application. If PSE applies for a conditional use permit to approve an Energize Eastside*



*alignment that is located within the boundaries of the EBCC, then the application would be characterized as a Process III application. Refer to LUC 20.35.015.D.2. If PSE applies for a conditional use permit to approve an Energize Eastside alignment that is located outside the boundaries of the EBCC, then the application would be characterized as a Process I application. Refer to LUC 20.35.015.B.*

(Emphasis supplied). It is apparent that PSE's gambit is to segment the process so that this integrated project is reviewed under two different land use processes based on its own arbitrary and non-sensible division. PSE plainly intends to attempt gaining approval for the South Segment of the project and then using that approval to put pressure on EBCC in the next round of permit review, which will be Process III. As you know, EBCC has rejected other PSE projects in its jurisdiction.

Our August 31, 2017, letter indicated that the segmentation of this project is illegal and inconsistent with sound public process standards. This is especially true for a project that has been under review for four years, employing two separate Phase 1 and Phase 2 DEIS's with separate scoping, public hearings and comment periods for each.

In fact, the Phase 1 DEIS issued January 28, 2016, was a specifically a non-project document as described on page 1.1:

*This first phase assesses the comprehensive range of impacts and implications associated with broad options for addressing PSE's objectives, in a non-project or programmatic Environmental Impact Statement (EIS).*

(Emphasis in original.) Per the PSE website, there were 1,078 pages of comments on the scope of this document. There were more than 500 comments on the Phase 1 DEIS, including 26 different organizations. At no time in that document was there any discussion that there might be a segmentation of this project.

In addition, Ms. Bedwell's encouragement to start commenting on the project in advance of issuance of the FEIS is certainly an insult to those who have spent literally thousands of hours to assemble comments on two DEIS's and are still awaiting the responses to these comments two years later. The City's introductory letter at the beginning of the Phase 1 DEIS says: "The Final EIS will include responses to comments on both the Phase 1 Draft EIS and the Phase 2 Draft EIS." Under WAC 197-11-560, FEIS response to comments is required:

*The lead agency shall consider comments on the proposal and shall respond by one or more of the means listed below, including its response in the final statement. Possible responses are to:*

- (a) *Modify alternatives including the proposed action.*
- (b) *Develop and evaluate alternatives not previously given detailed consideration by the agency.*
- (c) *Supplement, improve, or modify the analysis.*
- (d) *Make factual corrections.*
- (e) *Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency's response and, if appropriate, indicate those circumstances that would trigger agency reappraisal or further response.*

Even if it was appropriate to proceed to review the orphan South Segment, CENSE and other members of the public should be given full opportunity to review the FEIS and prepare input to the Hearing Examiner in Bellevue, and the other jurisdictions, based on its content. Keep in mind that more than two years was spent developing two DEIS's, both of which will be responded to in this FEIS. Please recall, early on we asked the City to prepare a single FEIS for each phase, but the City refused.

In summary, we request the City to take the following actions:

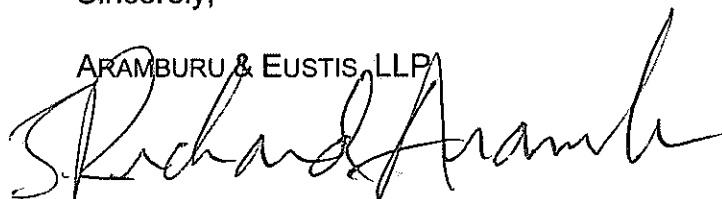
First, defer any further review of the application for the South Bellevue Segment until applications have been received for the other Bellevue segments as well as the Renton, Newcastle and Redmond segments.

Second, provide sufficient time for thorough review of the FEIS in advance of the public hearings. It is fundamentally unfair to allow PSE to prepare for the hearings with full knowledge of the content of the FEIS (indeed it is being written by the City and PSE) unless the public has the same privilege.

Thank you for your consideration of these comments. Because there was no answer to our attached letter of August 31, 2017, we request that you reply to today's comments no later than January 25, 2018. We look forward to your response.

Sincerely,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

## Rick Aramburu

---

**From:** HBedwell@bellevuewa.gov  
**Sent:** Tuesday, January 09, 2018 5:06 PM  
**To:** carol@aramburu-eustis.com; Rick@aramburu-eustis.com  
**Subject:** RE: ARAMBURU NON-DELIVERY - #2 - PSE Transmission Proposal.

Mr. Aramburu,

Thank you for your forwarded message. I do not have resolution from our IT department yet regarding an explanation for your undeliverable message. I can say we've been having a lot of network instability over the past several days and there may be some association with the instability and the reason for the email being undeliverable. I will update you on this issue when I have additional information to share. I assume you will confirm receipt of this message assuming you are able to receive it.

Regarding the remainder of your email, I can appreciate that your clients and other interested parties are anxious for the release of the FEIS. At this time we are anticipating a March 1<sup>st</sup> availability date. This assumes our final editing and production process goes as anticipated. However, the partner cities are still in the process of finalizing the FEIS, so this March 1<sup>st</sup> date may be subject to change.

Although I understand you and your clients are anxious to review the FEIS, please note that there is no additional comment period on the FEIS. As you are aware, the City provided copies of the DEIS, free of charge, in an effort to facilitate the DEIS commenting process. The City also extended the DEIS comment period, per your request, to provide additional time for public comment. The FEIS will contain responses to the comments submitted during the applicable time period, but there is no subsequent comment period on the FEIS itself. Once finalized, the FEIS will be issued and circulated as required by WAC 197-11-460(1). In the meantime, I would refer you to the DEIS, which remains publicly available, for the bulk of the substantive information that will be contained in the FEIS, and I appreciate your patience while the partner cities finalize the FEIS.

Many members of the CENSE community have expressed confusion regarding the two different processes that are currently underway, *i.e.*, the EIS process and the permitting process. Please note that we are in the active permit review phase (in both Bellevue and Newcastle), and I again encourage anyone who is interested in this project to focus their comments on the permit applications that have been submitted to the partner jurisdictions as well as the City of Bellevue. It bears repeating that the comment period for the DEIS is closed, and there is no subsequent comment period for the FEIS. Although the FEIS will be available for consideration by the partner cities as part of the permitting process, the FEIS is not a decision making document. It is one piece of information that decision makers, like the Director and Hearing Examiner at the City of Bellevue, will consider when making a decision on the subject permits. In order to limit confusion, and because the comment period on the DEIS has long since passed, it is best to direct comments and review at this time to the permit application materials. The City recommends that interested parties submit comments on the permits early in the permitting process, rather than waiting to comment until after the FEIS is available. This of course does not preclude you or your clients from submitting additional comments at the public hearing on the permit applications.

As I explained in previous communications to CENSE representatives, the City's current estimate is that the Director's Recommendation and Notice of Public Hearing will be issued no sooner than approximately 6 weeks after the FEIS is available. Your email references 6 weeks between FEIS availability and a public hearing. However, that is not what my communication noted. Instead, I explained that the City anticipated 6 weeks between the FEIS availability and the Director's Recommendation and Notice of Public Hearing. Typically, the City provides notice three weeks in advance of the public hearing. Thus, we currently anticipate over two months between the date the FEIS will be available and the public hearing on the permit applications that PSE has submitted to the City.

|                                        |
|----------------------------------------|
| CENSE Attachment 2<br>January 17, 2018 |
|----------------------------------------|

Finally, if you have not done so I would recommend you sign up for alerts from the project permitting [page](#). Communication on the permit process will be available on this page in addition to the city's standard noticing procedures. Any questions you may have regarding the permit process in other jurisdictions should be directed to those specific jurisdictions.

Sincerely,



**Heidi M. Bedwell**

Energize Eastside EIS Project Manager  
Environmental Planning Manager, Land Use Division  
Development Services Department  
425-452-4862

[www.bellevuewa.gov](http://www.bellevuewa.gov) and [www.mybuildingpermit.com](http://www.mybuildingpermit.com)

---

**From:** Carol at Aramburu-Eustis [mailto:carol@aramburu-eustis.com]

**Sent:** Tuesday, January 09, 2018 9:58 AM

**To:** Bedwell, Heidi <HBedwell@bellevuewa.gov>

**Cc:** Rick Aramburu <Rick@aramburu-eustis.com>

**Subject:** Re: ARAMBURU NON-DELIVERY - #2 - PSE Transmission Proposal.

Ms. Bedwell,

Rick has not received any response to his email below, forwarded to you (also for sharing with your IT person) last Friday.

Has a response been made?

Is there still a problem with Rick's email being rejected, or with you being able to send to that address?

---

Carol Cohoe  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue, SUITE 2000  
Seattle, WA 98104  
(206) 625-9515

As of June 1, 2013 we are in SUITE 2000.

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

On 2018-01-05 10:30, Carol at Aramburu-Eustis wrote:

Ms. Bedwell and IT, the original message Rick was trying to send (with the forwarding header deleted).

Carol Cohoe  
ARAMBURU & EUSTIS, LLP  
720 Third Avenue, SUITE 2000  
Seattle, WA 98104  
(206) 625-9515

As of June 1, 2013 we are in SUITE 2000.

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Thank you.

---

**From:** Rick Aramburu [<mailto:rick@aramburu-eustis.com>]

**Sent:** Thursday, January 04, 2018 1:31 PM

**To:** 'HBedwell@bellevuewa.gov '

**Cc:** 'Don Marsh' ([don.m.marsh@hotmail.com](mailto:don.m.marsh@hotmail.com))

**Subject:** PSE Transmission Proposal.

Heidi:

Happy 2018 to you.

Can you give me a better idea when the FEIS on the PSE 240 kV transmission proposal might be issued? In the meantime, is there a draft that we can review?

I want to make sure that CENSE and other impacted citizens and communities have sufficient time to review the document and prepare for hearings on the project itself. Given the length of the prior DEISs, I anticipate the FEIS will be a substantial document. In a prior email you mentioned a period as short as six weeks from the time the FEIS is issued and hearings are held. Given the length of these proceedings and the anticipated length of the FEIS, six weeks will not be enough time to prepare for any hearings.

Thank you.

Rick

J. Richard Aramburu

ARAMBURU & EUSTIS, LLP

720 Third Avenue

Pacific Building Suite **2000**

Seattle, WA 98104-1860

Telephone (206) 625-9515

Facsimile (206) 682-1376

This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and

destroy the message. Thank you.

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

---

J. Richard Aramburu  
rick@aramburu-eustis.com  
Jeffrey M. Eustis  
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August 31, 2017

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City of Bellevue  
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Via Email:  
CHelland@BellevueWA.gov

Steve Osguthorpe, AICP  
Community Development Director  
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Via Email:  
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Jennifer Henning  
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Renton City Hall  
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Renton, WA 98057

Via Email:  
JHenning@RentonWA.gov

Re: PSE Segmentation of Proposed Transmission line (“Energize Eastside”);  
Need for Supplemental DEIS on New Transmission Proposal in Renton,  
Newcastle and Bellevue

Dear Ms. Helland, Mr. Osguthorpe, and Ms. Henning:

As you are aware from our extended correspondence, I represent the Coalition of Eastside Neighbors for Sensible Energy (CENSE). CENSE has registered their concerns in various forums over the past years concerning the 18-mile 230kv transmission line proposed by PSE, branded as part of its intensive public relations campaign as “Energize Eastside.” The “Energize Eastside” project was launched in December 2013, almost four years ago.

To date, PSE has prepared two separate draft environmental impact statements (DEISs) on its proposal. CENSE has provided extensive public comment on these documents, orally at public hearings and in writing. The most recent comment period

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| CENSE Attachment 1<br>January 17, 2018 |
|----------------------------------------|

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on the Phase 2 DEIS ended on June 21, 2017, about two months ago. On the first page of that document (dated May 8, 2017), the “Energize Eastside” project was described as follows:

*The Energize Eastside project is a proposal to construct approximately 18 miles of new 230 Kilovolt (kV) electrical transmission lines and to add a new substation (Richards Creek) at the Lakeside substation in Bellevue to connect two existing bulk energy systems (one to the north in Redmond and one to the south in Renton), supply future electrical capacity and improve electrical grid reliability for Eastside communities.”*

The final environmental impact statement (FEIS) is, according to the “Energize Eastside” website, to be publicly available in early 2018. Pursuant to the SEPA rules, no hearings can proceed on any permit applications for this proposal until the FEIS is available.

During environmental review, the routing of PSE’s proposed transmission has always been considered a single project, albeit with routing options. The Phase I DEIS spent some fifty-four pages discussing project alternatives, but there was no discussion of segmenting the project for permitting or construction that would divide the project into a northern and southern component.

Recently, PSE has made major press releases advertising that it has chosen a route for the 18-mile transmission line, referenced by PSE as the “Willow Route,” although no actual permit applications have been received from PSE for this route. Permit applications would be required in Renton, Newcastle and Bellevue.

Given the background described above, CENSE members were surprised to read on the “Energize Eastside” website approximately three weeks ago the following:

*PSE will soon submit permit applications for the southern portion of the project. PSE’s plan is to build and energize the new Richards Creek substation in Bellevue and upgrade the transmission lines in south Bellevue, Newcastle, and Renton by summer 2018. We anticipate submitting permits for the northern portion later this year.*

*We need to build Energize Eastside in two construction phases to keep the backbone of the existing transmission system online and serving customers. By having the southern portion in service by next summer, we can avoid the need for rolling blackout plans. Once we’ve energized the southern portion of the project, we will begin work on the northern portion.*



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From the foregoing, PSE indicates it will ask Bellevue, Newcastle and Renton to review and process separate permit applications for the southern segment of the project. It also says that by building the southern segment of the project, PSE “can avoid the need for rolling blackout plans.” As described above, this piecemealing of the proposal is entirely new.

For the reasons stated below, CENSE believes that separating this single project into two segments is inconsistent with applicable statutes, rules and regulations. Accordingly, we ask that Renton, Newcastle and Bellevue not accept separate applications for processing but insist on a single application and review for the entire 18-mile project. In addition, the statement that the southern portion will provide previously undisclosed benefits requires the preparation of a supplemental DEIS to discuss the segmenting proposal. The basis for our position is set forth below.

First, throughout the protracted SEPA process the proposal has been considered a single project. This was due in part to PSE statements in the first DEIS that the proposed transmission will be necessary to serve the Bellevue Central Business District and surrounding areas. Certainly there is no documentation that communities along PSE’s proposed southern segment are in need of additional transmission capacity. No alternatives were identified in either DEIS that would divide the project into two separate segments.

If the applicant now intends to divide the proposal into segments, that alternative must be considered in a supplemental EIS. If building the southern segment of the project separately really does “avoid the need for rolling blackout plans,” then that alternative should be considered in environmental review. Given the history of the review of this project, starting in December 2013, it is implausible that PSE would not have known of this course of action in May, 2017, when the Phase 2 DEIS was issued. This is the kind of new information about the project that requires a supplemental DEIS under WAC 197-11-405(4)(b),

Second, the bifurcation of the project is contrary to established land use and planning law. The impacts of the whole project must be considered in a single proceeding, lest the impacts of the whole are lost in an artificial division. Indeed, as the CENSE comments at various stages of the project have shown, the project as a whole lacks merit (and is a waste of public resources) because there is no need for it.

A single proposal needs a single public hearing and one review.

Third, bifurcating the process into north and south segments creates an unnecessary and wasteful review process. Interested citizens would be required to participate in two separate reviews for a single project. Local residents have already had to endure two

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separate and duplicative SEPA draft environmental impact statement reviews. To extend this process further with PSE's plan to try to wear out concerned neighbors with separate and duplicative reviews is inappropriate to the cities' policies of engagement of local citizens in the land use review process.

Fourth, PSE's announced intention is to have permits issued for its proposed new "South Segment" in early 2018. However, according to its own website, the final environmental impact statement for the proposal will not be issued until early 2018. The SEPA Rules, in effect for more than thirty years, provide at WAC 197-11-655(2) that:

Relevant environmental documents, comments, and responses shall accompany proposals through existing agency review processes, as determined by agency practice and procedure, so that agency officials use them in making decisions.

See also SEPA itself, RCW 43.21C.030(2)(d) (the detailed statement shall accompany the proposal through the existing agency review processes). Accordingly, the review process for the South Segment, even if appropriate under the law, cannot begin until the cities have the FEIS available for review.

Fourth, it is apparent that the *raison d'être* for the bifurcation of the project is to avoid engaging the East Bellevue Community Council (EBCC) in decision-making for the whole project. As described in *Puget Sound Energy, Inc. v. East Bellevue Community Council*, 74464-0-1, 74465-8-1, Court of Appeals of Washington, Division 1, January 30, 2017 (Unpublished), EBCC has previously been critical of PSE transmission projects within its jurisdiction. By dividing its project into separate north and south segments, and proposing to proceed with the south segment first, PSE can avoid EBCC decision-making while it builds the south segment of the project. The cities should not permit this deliberate avoidance of permitting procedures requiring local community review of conditional use permits.

Washington law has been clear for many years that segmentation of a single project is not appropriate. In *Merkel v. Port of Brownsville*, 8 Wn.App. 844, 509 P.2d 390 (1973), the Court rejected the segmentation of a single project into shoreline and upland elements for approval. The court indicated:

There is nothing in the record before us to indicate that the contemplated construction has ever been anything but one project. The question, therefore, is whether the Port may take a single project and divide it into segments for purposes of SEPA and SMA approval.

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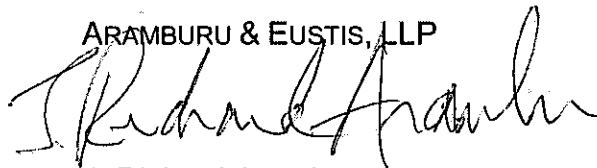
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In summary, PSE's announced intention to take its single project, long touted by it as necessary to address growth in downtown Bellevue and environs, and break it into two parts. Such a bifurcation is inconsistent with the prior extensive SEPA review, with local ordinances and with Washington caselaw and the cities should not accept piecemeal applications for the project. Further, given the utility promoted for the project to resolve "rolling blackouts" without addressing that issue in the two DEISs, a supplemental DEIS must be prepared to address, document and consider this new alternative. We ask Renton, Newcastle and Bellevue to decline to accept piecemeal permits for this project.

Thank you for your attention to this request. If you have any questions, please contact the undersigned.

Sincerely,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

JRA:cc

cc: CENSE  
Bellevue City Council  
Newcastle City Council  
Renton City Council

# ARAMBURU & EUSTIS, LLP

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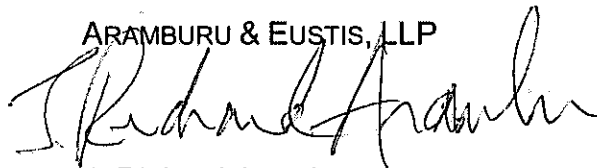
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