

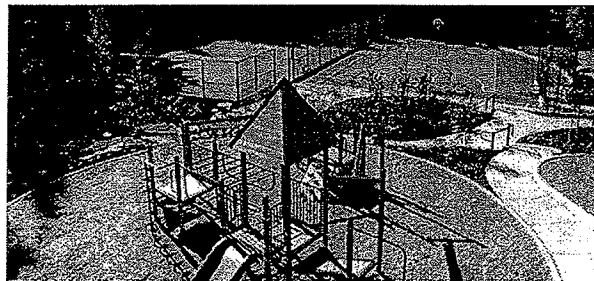
Utilities Element

GOALS:

1. To promote and encourage the development and maintenance of all utilities at the appropriate levels of service to accommodate the City of Bellevue's projected growth.
2. To promote and encourage the provision of reliable utility service in a way that balances the public's concerns about safety and health impacts of utility infrastructures, consumers' interest in paying no more than a fair and reasonable price for the utility's product, Bellevue's natural environment and the impacts that utility infrastructures may have on it, and the community's desire that utility projects be aesthetically compatible with surrounding land uses.
3. To process permits and approvals for utility facilities in a fair and timely manner and in accord with development regulations which encourage predictability.
4. To encourage new technology that improves utility services and reliability while balancing health and safety, economic, aesthetics, and environmental factors

OVERVIEW

The Utilities Element contains policies and maps that guide the siting of utility facilities in the city. The main purpose of this element is to ensure that Bellevue will have utility capacity to adequately serve the Land Use Plan. Policies also address the quality, reliability, safety and regulation of the services provided. Other policies address environmental impacts, facilities location and construction, economics, and aesthetics in design and landscaping.



Innovative design can help utilities complement the surrounding neighborhoods (Cherry Crest Reservoir).

Discussion: To accomplish this, the city participates in the Cascade Water Alliance, facilitating the development of a regional water supply system that effectively balances regional water resources and regional East King County water supply needs and provides equitable participation in ownership and management.

POLICY UT-27. Provide a water supply that meets all federal drinking water quality standards.

POLICY UT-28. Provide reliable water service for domestic use, fire flow protection, and emergencies.

POLICY UT-29. Promote conservation and the wise and efficient use of the public water supply and discourage the waste of this valuable resource.

Discussion: Bellevue will promote the efficient use of the public water supply to customers through education, technical assistance and incentive programs. Programs will be made available to customers locally or through the Cascade Water Alliance when programs are implemented by the Cascade partners throughout the Cascade Water Alliance.

POLICY UT-30. Improve the quality and quantity of the water supply of wellwater users by allowing access to the city water system as contained in the Water Comprehensive functional Plan, and provided that at least the fair share costs are paid by the benefiting parties.

POLICY UT-31. Serve as a role model for the community in the efficient use of water.

Non City-Managed Utilities

Authority

The Washington Utilities and Transportation Commission (WUTC) has the authority from longstanding state law to regulate the services and define the costs that a utility can recover, to ensure that the utility acts prudently and responsibly.

With the adoption of the 1990 Growth Management Act (GMA), current law now suggests that both the WUTC and Bellevue have jurisdiction over the activities of electric, gas, and telephone utilities within Bellevue's city limits.

The City of Bellevue has the authority to regulate land use and, under GMA, the requirement to consider the location of existing and proposed utilities and potential utility corridors in land use planning. The city must also plan for the adequate

provision of utilities consistent with the goals and objectives of its Comprehensive Plan, taking into consideration the public service obligation of the utility involved.

The City of Bellevue is entitled to reasonable compensation for use of its rights-of-way, and leases of city owned property, structures and conduits.

The Telecommunications Act of 1996 established new responsibilities for the Federal Communications Commission (FCC) in licensing of personal wireless communication service providers. The licenses allow the right to use a block or blocks of the Radio Frequency Spectrum to provide wireless communication services.

Section 704(a)(7) of the Act recognizes the authority of state and local governments over decisions regarding siting of personal wireless communication service facilities, subject to certain limitations.

Electrical Service

While it is critically important to meet growing demand for electrical service and further develop the reliability of Bellevue's electrical system, it is also important to ensure that new and expanding electrical facilities are sensitive to neighborhood character. Figure UT.5a identifies those planned facilities that have the potential to create significant incompatibilities with Bellevue neighborhoods. This figure resulted from an analysis of planned facility locations and manner of expansion anticipated by PSE's system plan. Such factors as proximity to residential neighborhoods, visual access, and expansion within or beyond an existing facility border were considered in identifying potential incompatibilities. The early screening identifies a list of facilities that will require special siting scrutiny. This is intended to increase transparency of the siting process for PSE and the public, while also ensuring the utility's ability to meet system needs.

Puget Sound Energy (PSE) builds, operates, and maintains the electrical utility system serving the City of Bellevue. PSE is an investor-owned utility with the responsibility for providing service to over 1,056,000 electric customers in a nine county service area. Bellevue is part of a larger service area called the "Greater Bellevue Area" which is roughly the area between Lake Washington and Lake Sammamish. The Greater Bellevue Area includes the entire cities of Bellevue, Beaux Arts, Medina, Hunts Point, Yarrow Point, and Clyde Hill, portions of Kirkland and Redmond and small portions of unincorporated King County.

PSE imports electrical energy from generation sources in Canada, on the Columbia River, and from other generation sites inside and outside of PSE's service territory.

PSE's goals are to meet future customer needs for electrical service, enhance system reliability, and maintain safe facilities. As of the end of 2007, PSE served more

Utilities Element applicable electrical facility policies:

Overview (continued):

As the city considers requests for proposed utility facilities, particularly electric and telecommunications, a wide variety of factors are taken into consideration. These factors include health and safety, aesthetics, environmental impacts and economic factors. The following should guide consideration of these requests:

Ordinarily, the elimination or mitigation of known health or safety risks associated with a project should be given first priority. In particular cases, however, a severely negative impact of mitigation measures on the reliability of the service network, on the cost of service, or on environmental or aesthetic values may dictate the choice of a different option. In every case, cost is a factor that is to be considered, with particular attention to maintaining Bellevue's viability as a regional employment center. However, costs should be weighed against a full consideration of benefits, both tangible and intangible, that may be derived from more "costly" options. In no case should it be automatically assumed that the "cheapest" option is the least costly on a "net" or long term basis or is the most desirable under these policies. Individual implementation issues arising under these policies should be resolved on a case-by case basis in light of the considerations above.

General Non City-Managed Utilities

POLICY UT-32. Defer to the serving utility the implementation sequence of utility plan components.

POLICY UT-33. Coordinate with the appropriate jurisdictions and governmental entities in the planning and implementation of multi-jurisdictional utility facility additions and improvements.

POLICY UT-39. Require the undergrounding of all new electrical distribution and communication lines except that interim installation of new aerial facilities may be allowed if accompanied by a program to underground through coordination with the city and other utilities. Require the undergrounding of all existing electrical distribution and communication lines where a change in use or intensification of an existing use occurs, unless delayed installation is approved as part of a specific program to coordinate undergrounding of several utilities or in conjunction with an undergrounding program for several sites or when related to street improvements. Interim facilities should be limited to the aerial installation of a new line of 1/2" diameter or less.

POLICY UT-44. Encourage the use of utility corridors as non-motorized trails.

Discussion: The city and utility company should coordinate the acquisition, use, and enhancement of utility corridors for pedestrian, bicycle and equestrian trails and for wildlife corridors and habitat.

POLICY UT-45. Avoid, when reasonably possible, locating overhead lines in greenbelt and open spaces as identified in the Parks, Recreation, and Open Space Plan.

POLICY UT-46. Facilitate the conversion to cost-effective and environmentally sensitive alternative technologies and energy sources.

POLICY UT-48. Encourage cooperation with other jurisdictions in the planning and implementation of multi-jurisdictional utility facility additions and improvements. Decisions made regarding utility facilities shall be made in a manner consistent with, and complementary to, regional demand and resources, and shall reinforce an interconnected regional distribution network.

POLICY UT-49. Encourage communication among the city, the WUTC, and utilities regulated by the WUTC about the distribution of costs for existing and proposed utility facilities; especially requirements for the undergrounding of transmission, distribution, and communication lines exceeding statewide norms.

POLICY UT-50. Encourage system practices intended to minimize the number and duration of interruptions to customer service.

POLICY UT-51. Prior to seeking city approval for facilities, encourage utilities service providers to solicit community input on the siting of proposed facilities which may have a significant adverse impact on the surrounding community.

Non City-Managed Utilities - Additional Electrical Facilities Policies

POLICY UT-68. Encourage the public to conserve electrical energy through public education.

POLICY UT-69. Encourage city and utility involvement with regional or statewide agencies when and if they are developing policies regarding exposure to electric and magnetic fields (EMF) or other utility issues.

POLICY UT-70. Review periodically, the state of scientific research on EMF and make changes to policies if the situation warrants.

POLICY UT-71. Require in the planning, siting, and construction of all electrical facilities, systems, lines, and substations that the electrical utility strike a reasonable balance between potential health effects and the cost and impacts of mitigating those effects by taking reasonable cost-effective steps.

POLICY UT-72. Work with Puget Sound Energy to implement the electrical service system serving Bellevue in such a manner that new and expanded transmission and substation facilities are compatible and consistent with the land use pattern established in the Comprehensive Plan.

Discussion: Where feasible, electrical facilities should be sited within the area requiring additional service. Electrical facilities primarily serving commercial and mixed use areas should be located in commercial and mixed use areas, and not in Wireless facilities are sited to reduce the impacts of these necessary facilities. areas that are primarily residential. Further, the siting and design of these facilities should incorporate measures to mitigate the visual impact on nearby residential areas. These considerations must be balanced with the community's need to have an adequate and reliable power supply.

POLICY UT-73. Require siting analysis through the development review process for new facilities, and expanded facilities at sensitive sites, including a consideration of alternative sites.

Discussion: Sensitive facility sites are those new facilities and existing facilities proposed to be expanded where located in or in close proximity to residentially-zoned districts such that there is potential for visual impacts absent appropriate siting and mitigation. The city will update Figure UT.5a to the extent needed to stay current with changes in PSE's system planning.

POLICY UT-74. Avoid, minimize and mitigate the impacts of new or expanded electrical facilities through the use of land use regulations and performance standards that address siting considerations, architectural design, site screening, landscaping, maintenance, available technologies, and other appropriate measures.

POLICY UT-75. Work with and encourage Puget Sound Energy to plan, site, build and maintain an electrical system that meets the needs of existing and future development, and provides highly reliable service for Bellevue customers.

Discussion: Providing highly reliable service is a critical expectation for the service provider, given the importance of reliable and uninterrupted electrical service for public safety and health, as well as convenience. Highly reliable service means there are few and infrequent outages, and when an unavoidable outage occurs it is of short duration and customers are frequently updated as to when power is likely to be restored. A highly reliable system will be designed, operated and maintained to keep pace with the expectations and needs of residents and businesses as well as evolving technologies and operating standards as they advance over time.

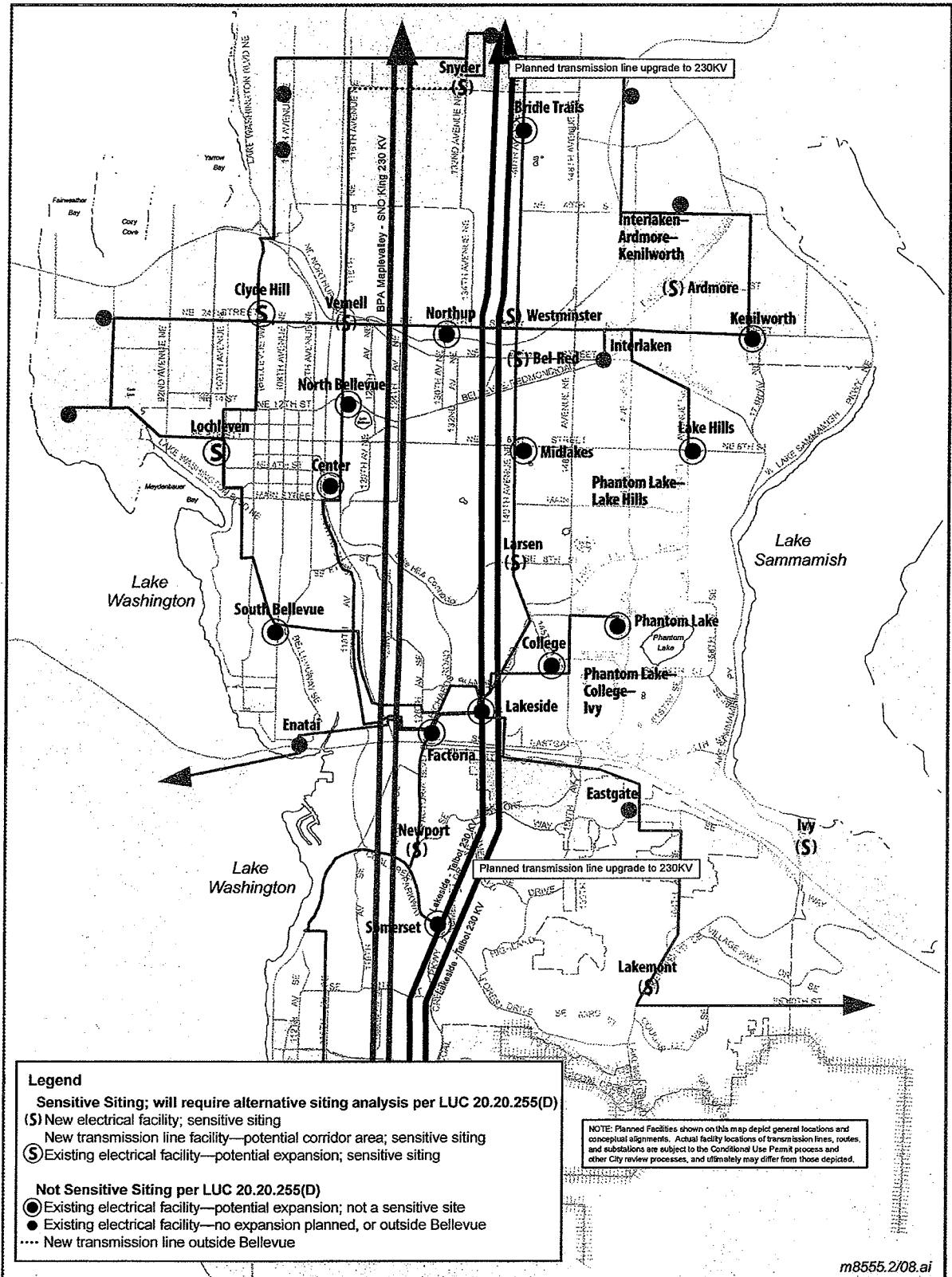
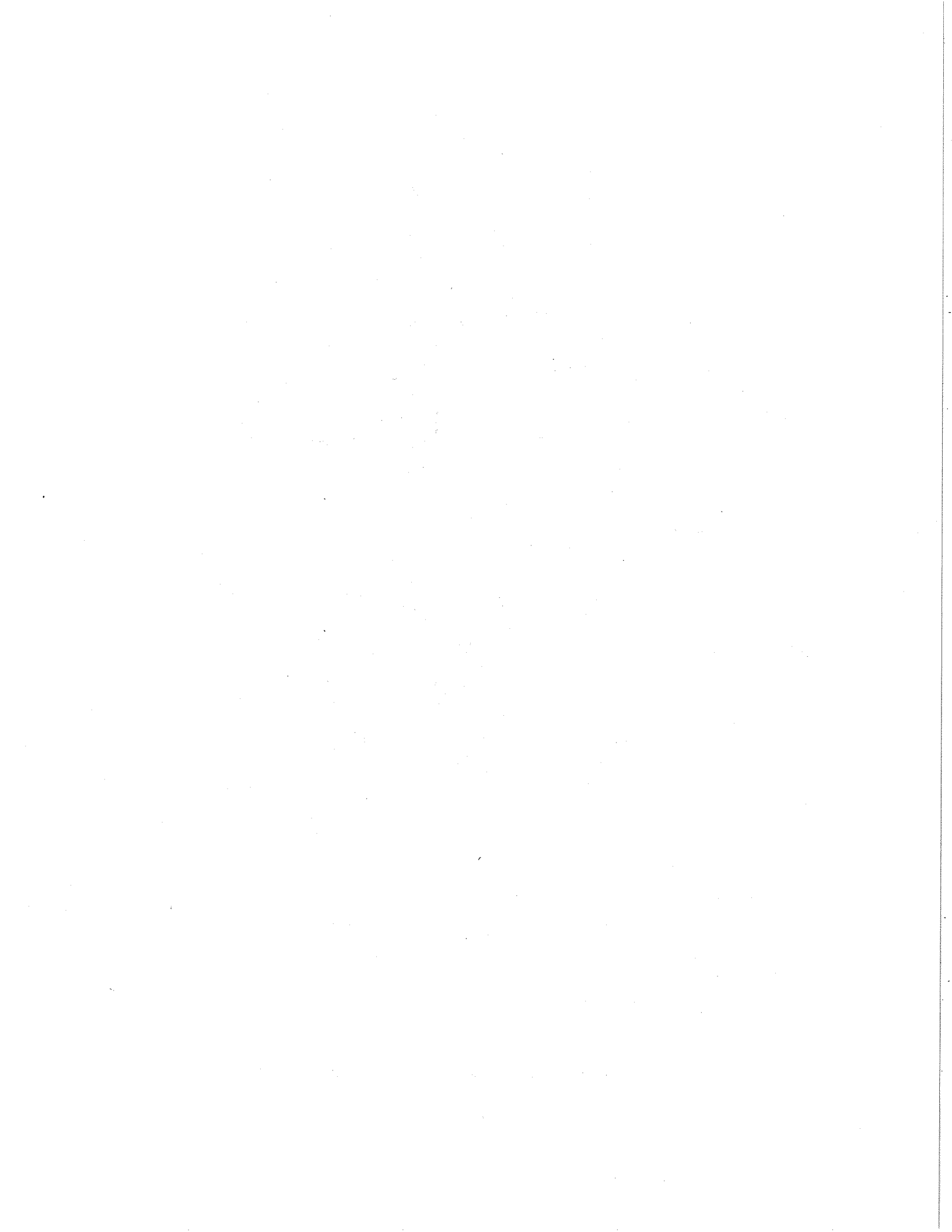


FIGURE UT.5a
New or Expanded Electrical Facilities





20.20.255 Electrical utility facilities.

A. Purpose.

The purpose of this section is to regulate proposals for new or expanding electrical utility facilities and to minimize impacts associated with such facilities on surrounding areas through siting, design, screening, and fencing requirements.

B. Applicability.

This section applies to all proposals for new or expanding electrical utility facilities as defined in LUC 20.50.018.

C. Required Review.

For new or expanding electrical utility facilities proposed on sensitive sites as described by Figure UT.5a of the Utilities Element of the Comprehensive Plan, the applicant shall obtain Conditional Use Permit approval under Part 20.30B LUC. For expansions of electrical utility facilities not proposed on sensitive sites as described by Figure UT.5a, the applicant shall obtain Administrative Conditional Use Permit approval under Part 20.30E LUC.

1. **Conditional Use Permit.** In addition to the requirements set forth in Part 20.30B LUC and Part 20.25B LUC (if applicable), the applicant shall:
 - a. Complete the alternative siting analysis as set forth in subsection D of this section;
 - b. Hold an informational public meeting prior to the public hearing required by LUC 20.35.137 and in addition to the informational public meeting required in LUC 20.35.127; and
 - c. Comply with all applicable decision criteria and design standards set forth in this section.
2. **Administrative Conditional Use.** In addition to the requirements set forth in Part 20.30E LUC and Part 20.25B LUC (if applicable), the applicant shall comply with all decision criteria and design standards set forth in this section, provided the applicant is not required to complete the alternative siting analysis set forth in subsection D of this section.

D. Alternative Siting Analysis.

In addition to the requirements set forth in Part 20.30B LUC, Part 20.25B LUC (if applicable), and the decision criteria and design standards set forth in this section, the applicant shall identify alternative sites, provide required content showing analysis relating to identified sites, describe technologies considered, and describe community outreach conducted for proposals relating to new or expanding electrical utility facilities on sensitive sites as described in this section.

1. **Alternative Sites Analyzed.** Prior to submittal of the application for Conditional Use Permit required pursuant to subsection C of this section, the applicant shall identify not less than three alternative site options to meet the system needs for the proposed new or expanding electrical utility facility. At least one of the alternative sites identified by the applicant shall be located in the land use district to be primarily served by the proposed electrical utility facility.
2. **Content of Alternative Siting Analysis.** Upon submittal of the Conditional Use Permit application required pursuant to subsection C of this section, the applicant shall submit results of the siting analysis which:
 - a. Describe the sites identified in subsection D.1 of this section and the land use districts within which the sites are located.
 - b. Map the location of the sites identified in subsection D.1 of this section and depict the proximity of the sites to Neighborhood Business Land Use Districts, Residential Land Use Districts, and Transition Areas.
 - c. Describe which of the sites analyzed are considered practical or feasible alternatives by the applicant, and which of the sites analyzed are not considered practical or feasible, together with supporting information that justifies the conclusions reached. For sites located within a Neighborhood Business Land Use District, Residential Land Use District, and/or Transition Area (including the Bel-Red Office/Residential Transition (BR-ORT), the applicant shall:

- i. Describe whether the electrical utility facility location is a consequence of needs or demands from customers located within the district or area; and
 - ii. Describe whether the operational needs of the applicant require location of the electrical utility facility in the district or area.
 - d. Identify a preferred site from the alternative locations considered for the proposed new or expanding electrical utility facility. The following location selection hierarchy shall be considered during identification of the preferred site alternative: (i) nonresidential land use districts not providing transition, (ii) nonresidential Transition Areas (including the Bel-Red Office/Residential Transition (BR-ORT), and (iii) residential areas. The applicant may identify a preferred site alternative in a Residential Land Use District or Transition Area (including the Bel-Red Office/Residential Transition (BR-ORT) upon demonstration that the location has fewer site compatibility impacts than a nonresidential land use district location.
- 3. Technology Considered for the Preferred Site Alternative. Upon submittal of the Conditional Use Permit application required pursuant to subsection C of this section, the applicant shall:
 - a. Describe the range of technologies considered for the proposed electrical utility facility;
 - b. Describe how the proposed electrical utility facility provides reliability to customers served;
 - c. Describe components of the proposed electrical utility facility that relate to system reliability; and
 - d. Describe how the proposed facility includes technology best suited to mitigate impacts on surrounding properties.
- 4. Community Outreach Conducted. Upon submittal of the Conditional Use Permit application required pursuant to subsection C of this section, the applicant shall provide a description of all methods of community outreach or involvement conducted by the applicant prior to selecting a preferred site for the proposed electrical utility facility.

E. Decision Criteria.

In addition to the requirements set forth in Part 20.30B LUC, Part 20.30E LUC, Part 20.25B LUC (if applicable), and other applicable provisions of this section, all proposals to locate or expand electrical utility facilities shall comply with the following:

- 1. The proposal is consistent with Puget Sound Energy's System Plan;
- 2. The design, use, and operation of the electrical utility facility complies with applicable guidelines, rules, regulations or statutes adopted by state law, or any agency or jurisdiction with authority;
- 3. The applicant shall demonstrate that an operational need exists that requires the location or expansion at the proposed site;
- 4. The applicant shall demonstrate that the proposed electrical utility facility improves reliability to the customers served and reliability of the system as a whole, as certified by the applicant's licensed engineer;
- 5. For proposals located on sensitive sites as referenced in Figure UT.5a of the Utility Element of the Comprehensive Plan, the applicant shall demonstrate:
 - a. Compliance with the alternative siting analysis requirements of subsection D of this section;
 - b. Where feasible, the preferred site alternative identified in subsection D.2.d of this section is located within the land use district requiring additional service and residential land use districts are avoided when the proposed new or expanded electrical utility facility serves a nonresidential land use district;
- 6. The proposal shall provide mitigation sufficient to eliminate or minimize long-term impacts to properties located near an electrical utility facility.

F. Design Standards.

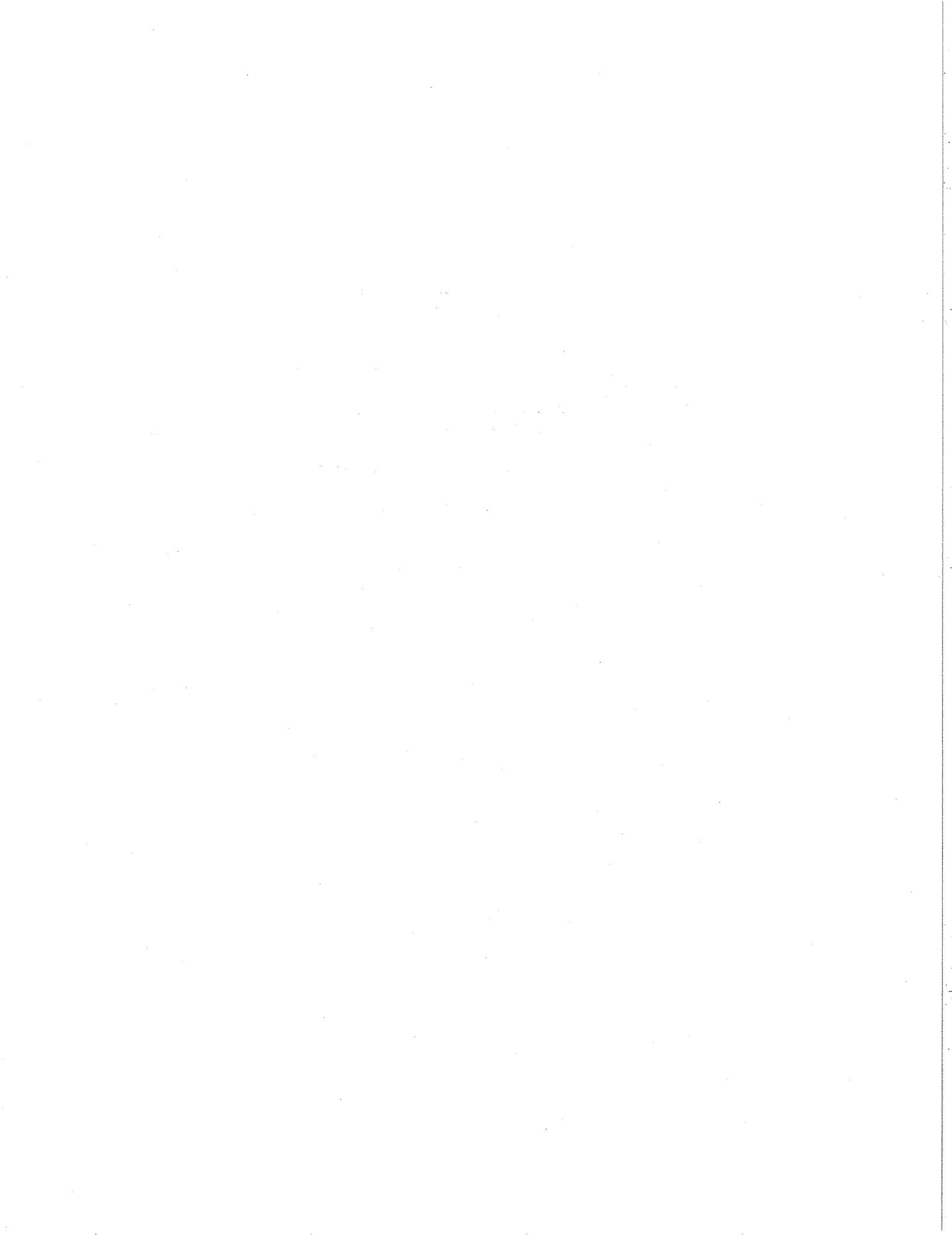
In addition to the requirements set forth in Part 20.30B LUC, Part 20.30E LUC, Part 20.25B LUC (if applicable), and other applicable provisions of this section, all proposals to locate or expand an electrical utility facility shall comply with the following:

1. **Site Landscaping.** Electrical utility facilities shall be sight-screened as specified in LUC 20.20.520.F.2 or as required for the applicable land use district. Alternatively, the provisions of LUC 20.20.520.J may be used, provided this subsection does not apply to transmission lines as defined in LUC 20.50.018;
 2. **Fencing.** Electrical utility facilities shall be screened by a site-obscuring fence not less than eight feet in height, provided this subsection does not apply to transmission lines as defined in LUC 20.50.018. This requirement may be modified by the City if the site is not considered sensitive as referenced in Figure UT.5a of the Utility Element of the Comprehensive Plan, is adequately screened by topography and/or existing or added vegetation, or if the facility is fully enclosed within a structure. To the maximum extent possible, all electrical utility facility components, excluding transmission lines, shall be screened by either a site-obscuring fence or alternative screening;
 3. **Required Setback.** The proposal (including required fencing) shall conform to the setback requirement for structures in the land use district; and
 4. **Height Limitations.** For all electrical utility facility components, including transmission lines, the City may approve a request to exceed the height limit for the underlying land use district if the applicant demonstrates that:
 - a. The requested increase is the minimum necessary for the effective functioning of the electrical utility facility; and
 - b. Impacts associated with the electrical utility facility have been mitigated to the greatest extent technically feasible.
- G. Mitigation Measures.**
 The City may impose conditions relating to the location, development, design, use, or operation of an electrical utility facility to mitigate environmental, public safety, or other identifiable impacts. Mitigation measures may include, but are not limited to, natural features that may serve as buffers, or other site design elements such as fencing and site landscaping as provided for in subsection F of this section.
- H. Independent Technical Review.**
 The City may require the applicant pay for independent technical review by a consultant retained by the City for review of materials submitted by the applicant to demonstrate compliance with the requirements of the alternative siting analysis contained in subsection D of this section, the decision criteria contained in subsection E of this section and the design standards contained in subsection F of this section. (Ord. 5876, 5-18-09, § 11; Ord. 5805, 3-3-08, § 8)

20.50.018 E definitions.

Electrical Utility Facility. Distribution substations, transmission stations, transmission switching stations, or transmission lines that are built, installed, or established including:

- A. **Distribution Substation.** A facility at which electric power is taken from a transmission line, reduced in voltage and sent out through distribution circuits and lines to serve customers in a local area;
- B. **Transmission Station.** A facility for which transmission system voltage is decreased or increased. Transmission stations generally reduce transmission system voltage and connect to lower voltage transmission lines used to move electric power to distribution substations;
- C. **Transmission Switching Station.** A facility at which multiple transmission lines interconnect. Switching stations provide the ability to change the configuration of the transmission system as operational needs may require; and
- D. **Transmission Line.** An electrical line of at least 115kV that distributes electrical power to and from transmission switching and transmission stations to and from distribution substations, and which link generators to such stations. (Ord. 5805, 3-3-08, § 1)



4 Role of the City of Bellevue

4.1 Study

4.1.1 Study Scope

The Role of the City assessment was performed to answer the following question: “what opportunities are available to the City to work with PSE, regulators (WUTC, FERC), and other stakeholders to ensure the needs and expectations of Bellevue’s residents and businesses are met relative to the reliability of the power supply?”

4.1.2 Study Approach

The Role of the City assessment was performed in the following steps:

- Evaluation of potential interactions with the WUTC and other government agencies as it relates to the City’s ability to inform decision-makers or to advocate for policy change.
- Evaluation of City interaction with PSE around planning and permitting relative to influencing electric system reliability in Bellevue.
- Review of transparency of operations relative to improvements in communication between PSE and its customers as it relates to reliability.

4.2 Enhance Role of City as an Informed Stakeholder

4.2.1 Regulatory Agencies

4.2.1.1 Study Approach

Prior to discussing the opportunities for Bellevue to interact with regulatory agencies, it is important to understand the regulatory framework under which PSE operates the electric power system and the regulatory framework as it affects the City. A brief summary of the regulatory requirements and their impact on reliability is provided below.

4.2.1.2 WUTC

The WUTC provides oversight to electric utilities through regulations codified in the Washington Administrative Code (WAC) Chapter 480-100. As noted in WAC 480-100-001, the purpose of these regulations is “to administer and enforce chapter 80.28 RCW by

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establishing rules of general applicability and requirements for consumer protection, financial records and reporting, electric metering, and electric safety and standards". The principal statutes that define the WUTC's authority and responsibility with respect to electric utilities are found in the Revised Code of Washington (RCW) Title 80.

In determining the opportunity for Bellevue to interact with the WUTC, it is necessary to determine the overall role of this agency and PSE. The WUTC has a critical role in ensuring the reliable delivery of electric power. Relative to electric system reliability, there are several requirements that are highlighted here:

- PSE is required to publish and communicate rates for electric power delivery through the filing of tariffs and rate schedules with the WUTC (WAC 480-100-028 and WAC 480-100-103). Any changes to these tariffs or rate schedules must be reviewed and approved by the WUTC and are subject to public hearings (RCW 80.28.020 and WAC 480-100-194). This requires PSE to present its basis for the proposed increases (for its investments and costs for providing services) to the WUTC and to justify these expenditures as prudent since these expenditures are the basis for the increases and the means of PSE recovering their investment. The WUTC review process then results in approved expenditures that can be recovered through the tariffs and rate schedules.

This process of utility commission oversight is common to regulated utilities in the United States. In the case of PSE, they present their request for rate increases after investments are made so they are recovering expenses after they have been incurred. In other states, the rate case proceeding precedes the investments and the level of investment is approved prior to execution of projects. In the case of PSE, this requires that their investments (e.g. capital projects) be considered as prudent uses of capital across their entire system.

- PSE is required to have a rate structure that provides the same rates for similar service. This requirement is based on RCW 80.28.80. This requirement establishes a basis that a utility cannot provide preferred service and that service must be provided on a non-prejudicial basis except for a few special exemptions provided in the RCW. This requirement means that PSE must select projects to maintain their electric system assets from an overall system perspective.
- PSE is required to submit annual reliability reports that provide the service performance to its customers (WAC 480-100-398). This report highlights the current performance as well as actions that PSE will take to improve performance. This report addresses the entire service area. PSE indicates system circuits of concern (top 50) and identifies specific action for these circuits. For 2010, there were no circuits identified in the Bellevue area (although Lake Hills-23 was on the list in 2009) (Reference 4).
- Through RCW 19.285, the State of Washington has required that utilities meet a portion of their generation requirements through the use of renewable

4. Role of the City of Bellevue

technologies. The State has required that at least 15% of generation come from renewable by 2020. The intent of this requirement is to encourage the use of renewable energy sources and energy efficiency in the State of Washington. This requirement affects reliability in the sense that PSE must develop a generation mix that satisfies its load demands and its renewable energy portfolio. In the future, as renewable energy sources and distributed energy sources become a bigger power source and a more local source, there will be a challenge to maintain the transmission and distribution system within acceptable voltage levels.

- WUTC (WAC 480-100-238) requires utilities to submit an Integrated Resource Plan (IRP) that is intended to present how a utility will meet its system demand and what the mix of generation sources will be. The IRP is required to examine alternatives that allow for meeting future demand at the "lowest reasonable cost". Utilities are also required to address conservation relative to energy reduction from energy efficiency and other means. The requirement is to submit the IRP on a bi-annual basis.

PSE provides an IRP defining its strategy to respond to future load scenarios. The current IRP has been referred to previously in Section 3 in discussing future system status.

- Requirements for delivery of power are specified in WAC 480-100-368 and -373 for system frequency and voltage, respectively. The requirements state that system must be operated at a frequency of 60 cycles per second under normal conditions and the voltage (depending on service class) must be maintained within +/- 5% of the standard voltage on the distribution feeder. There are additional requirements related to both utility and customer actions to control voltage fluctuation.

This requirement directly relates to the issue of power quality. PSE is required to deliver voltage within the specified range. For customers who require a tighter band on voltage fluctuations, there are standard technologies employed by the end user at these sites to maintain the required voltage stability. Typically, information technology and manufacturing plants most often use site specific technologies to control voltage that may interrupt their operations.

- Through RCW 35.96.040, the State of Washington specifies requirements that allow cities or towns to create local improvement districts and to levy and collect special assessments against the real property benefitting from the conversion of overhead facilities to underground facilities. This requirement directly relates to the funding mechanism required to convert existing overhead facilities. Issues regarding the conversion of overhead lines to underground were presented in Section 2.1.4.2.

4. Role of the City of Bellevue

- Through RCW 36.70A, the State of Washington requires cities and counties to develop comprehensive land use plans to govern growth management in their jurisdictions.
- Through RCW 80.32, the State of Washington allows cities to establish franchise agreements with utilities relative to use of city rights-of-way (public roads, streets and highways).

There are additional requirements in the State of Washington statutes and WUTC regulations that govern interconnections to the electric system, requirements for the renewable portfolio and purchase of power from qualifying facilities.

4.2.1.3 WECC

The second organization with oversight responsibility is the Western Electricity Coordinating Council (WECC), which is chartered with ensuring the reliability and security of the bulk electric system in the Western Interconnection. Since PSE has limited bulk transmission assets, their involvement with WECC involves coordination of their transmission lines with the WECC area. PSE interacts with WECC for operations of its transmission lines at 100 kV and above. WECC provides requirements for operations and maintenance of the transmission system to ensure the reliability, stability and security of the transmission system in the Western United States and Canada. PSE involvement with WECC is mostly from an operations, maintenance and protection standpoint to ensure that its system operates and coordinates planning with other regional entities. WECC develops standards for the western region based on review and application of the North America Electric Reliability Council (NERC) reliability standards which defines requirements to maintain reliability of the transmission system in the United States. The WECC activities are focused only on transmission and do not reach into the distribution system within Bellevue or other parts of the PSE service territory. However, this interface is important from the transmission standpoint where events on the transmission system can result in significant wide-area outages.

4.2.1.4 Analysis

From a WUTC perspective relative to electric power, cities are considered as any other member of the public. This means that Bellevue has access to the published tariffs and rate schedules of PSE and has the ability to participate in public hearings and to offer comments and opinions relative to these hearings. Therefore, Bellevue's primary interaction with the WUTC is one of being an active participant relative to changes in laws and tariffs that may affect electric system reliability in the State of Washington.

From an overall regulatory perspective, the City has obligations to develop a Comprehensive Plan for growth management and has the right to assign Franchise Agreements to its utilities. These items are discussed in Section 4.2.4.

From the perspective of WECC, Bellevue has no real involvement with this group since it deals with issues on the transmission system (and large generation). WECC, however, does provide a source of information relative to electricity planning in the region and provides short-term and

4. Role of the City of Bellevue

long-term views of the electric transmission system. Their planning documents identify needs of the system moving forward and will provide Bellevue with an independent assessment of potential transmission needs in the area that may affect assets providing service to Bellevue or that are located in Bellevue.

4.2.1.5 Recommendations

There are potentially two areas of involvement by Bellevue relative to the WUTC:

- Since the WUTC operates and oversees all regulated utilities, any changes in fundamental requirements must be driven by state law and enforcement by the WUTC must be consistent and fair among all regulated companies. Therefore, Bellevue's involvement in this aspect is one of informing lawmakers and commissioners regarding matters that affect reliability. However, matters affecting the electric system must be viewed in a global rather than a local context.
- Bellevue does have the opportunity to comment or participate in matters directly affecting PSE and their interaction with the WUTC. It may be possible for Bellevue to support measures for investment brought forward by PSE that support its overall City goals for electric system reliability and service. Again, PSE has to propose its plans to the WUTC on a system-wide basis, but Bellevue has the ability to support and advocate for initiatives that meet its goals and objectives.

From an overall regulatory perspective, interaction with the regulatory agencies provides Bellevue with a means of keeping current of plans for the electric system and advocating for projects that meet Bellevue's objectives.

4.2.2 Puget Sound Energy

4.2.2.1 Study Approach

Bellevue's primary involvement in electric system reliability is through its interaction and collaboration with PSE. There are several areas where Bellevue is actively involved with electric system activities by PSE. The interaction between the City and PSE relative to specific reliability initiatives and outage performance was discussed in Section 2. The major areas of interaction discussed here are planning, permitting and emergency response.

4.2.2.2 City Policies

Bellevue establishes policies for utilities in the Utilities Element of the Comprehensive Plan⁷⁰. The City provides its long-term vision and plans in its Comprehensive Plan, which provides

⁷⁰ Reference 26.

4. Role of the City of Bellevue

goals, policies, and plans for all areas and aspects of City operations. The Utilities Element addresses many activities relating to electric reliability, including:

- A high level plan for utility capacity expansion to meet City and regional needs and to guide planning and decision-making.
- Coordination of public and private trenching activities (related to the potential for undergrounding opportunities)
- Notification to the City prior to vegetation management in the City rights-of-way
- Required undergrounding of all new electrical distribution facilities.
- Encouragement of consolidation of facilities
- Facilitation of conservation and environmentally sensitive energy sources.
- Encourage communication with utilities, the WUTC and the City about cost distribution and undergrounding of electric distribution lines.

All of these policies have the potential to impact reliability. Additionally, through the Franchise Agreement between the City and PSE, the City provides requirements for work in the City rights-of-way that are intended to reflect the policies of the Comprehensive Plan. Based on a review of these documents, the City is influencing reliability through its planning and permitting process, its vegetation management policies, the ability to underground new facilities, and coordination of activities to take advantage of joint utility efforts. In the longer term, renewable and alternate energy sources and conservation will factor into the overall electric energy picture in Bellevue.

The recommendations provided in Sections 2 and 3 are consistent with the policies of the Comprehensive Plan. The recommendations are based on driving to a reliable system that serves the needs of existing and new members (business and residential) of the community, that satisfies the City's goals, and that understands the requirements of PSE as a regulated utility. The recommendations are provided to support City reliability through improved system design (redundancy), expanded use of automation and information technology, and improved communications between the City and PSE on matters affecting reliability and growth.

4.2.2.3 Planning

Both Bellevue and PSE engage in planning for the City. However, the planning needs for each organization are focused on different areas and concerns. Bellevue planning is required to address services and land use planning across all aspects of city operations, such as impact on land use, rights-of way, roadways, water and sewage, and coordination of projects by other utilities (electric, gas and telecommunications). Therefore, planning by Bellevue involves the following: