

Reply Testimony of Kurt Mizee

PCN-2

1-16-19

It is my pleasure to submit the following reply testimony regarding the matter of PCN-2:

Detailed Line Description

With long and detailed testimony, the details of the lines, which are which and what routes they travel are sometimes hard to track. Please find Mizee Exhibits 201 and 202 attached to this testimony. I felt that with issues of redundancy and length in question it was easier to see from this map view.

Necessity

The previous round of testimony from Tillamook PUD stated that they were now claiming a need of 22 MW of capacity at the Oceanside substation to meet projected growth. This is substantially lower than the 33 stated previously (by the entire current peak demand load of the substation and more than double regular load). Previously PUD had stated that they were adding capacity to the system because they could send unused power back from the substation to the central valley. Subtracting the 4-11 MW of use at Oceanside and Netarts that means that they could send 22-29 MW back through a rebuilt Feeder 51. Therefore, Feeder 51 and potentially option 3 could both be capable of carrying the projected load of 22 MW out to Netarts and Oceanside without issue if constructed correctly negating the need for a substation.

What is necessary is the rebuild of Feeder 51. At the 1-15-19 TPUD Board Meeting the operations and engineering teams spoke of the recent wind events and how their lines are built “storm-hardened”. That they had some small tree incidents but that the lines were able to take the hit because of how they have been built and maintained. They also spoke of how they were in the process of opening up easements wider in terms of tree clearing. Neither of these things is the case with Feeder 51. The rebuild of Feeder 51 is long overdue, as TPUD has held it hostage as a lever to move the transmission line along. The recent cost of office expansion would have paid for the rebuild of this important infrastructure.

Practicability

TPUD claimed that it would “work with the community and its leaders to develop a route with least impact” and yet it has almost no buy in by the landowners, has resulted in multiple appeals and the replacement of two longtime board members in the last election. This project will have a significant impact to the agriculture and forestlands and to the scenic nature of Tillamook Bay. Just last week we received a bill from PUD at our farm for because of an interaction between a piece of our equipment and a pole in our field. This will only increase as more infrastructure is placed in agriculture lands and as farming practices change and equipment grows to become more efficient.

Justification

While it has already been established that a distribution option was never vetted by the public, nor was need for a transmission line it has yet to be discussed that the project has changed once again. Now the TPUD claims it needs 1/3 less power in Oceanside. The County Planning Commission and Board of Commissioners did not have this information when they made land use decisions and any public input taken reflects a perceived need of 33 MW. As mentioned above, a 115 KV line is not justified if the load can be carried on a distribution line and thereby keep load capacity available in the central valley where needed.

Financial Feasibility

Now that capacity of the proposed substation has been decreased, the cost per mile per megawatt has increased. We still have not seen a comparison of Life Cycle Cost (LCC) for any of these options. How is the PUD budgeting for long-term costs associated with this additional infrastructure? The public certainly has not had the opportunity to compare these costs on any of the options. It was announced at the 1-15-19 TPUD Board Meeting that there would be a 4% increase in rates starting in May of 2019 and another 4% one expected in the spring of 2020 to cover construction cost debt taken on. It is worth noting that in the fall prior to board elections that they indicated they didn't foresee rate increases. Last, I still believe that TPUD has grossly under-estimated the cost of legal fees and acquisition costs for high value farm and forest land.

Additional Routes

We have already noted that the public has not vetted alternative distribution routes. The maps provided and specifically Mizee 202 show that while a rebuilt Feeder 51 is capable of carrying enough load with room for growth, Option 3 adds the goal PUD has of redundancy. The red line of Option 3 is an existing distribution route along county roads. Where it turns to orange is the start of extending that line by following Eckloff road the rest of the way out to Hwy 131. At Highway 131 it crosses and they is proposed by PUD to be buried along existing logging roads to be distributed to Oceanside and Netarts. This alternative does have landowner support and does not create new impacts to any farmland while also bolstering existing distribution infrastructure.

Statewide Planning Goals

When citing utilities the statewide planning goals very specifically say that if a need can be met by citing a line outside of F-1 lands and along existing rights of way, it should be done. Given that the need can be met with distribution lines and that those lines can be placed along existing roadways this project is inappropriate and against Statewide Planning Goals.

Conclusion

TPUD continues to change its needs, massage the numbers and spend community money to push this project along, all the while raising rates for ratepayers. The community deserves to have a look at all facets of this project again and we urge you to deny the application for CPNC.

Kurt Mizee
Exhibits 201 & 202
PCN-2 Reply Testimony

Overview Map

Map view of proposed PUD project including Option 3 and Cape Meares service options

Legend

- 115 KV Transmission Line
- Distribution from Oceanside Substation to Netarts and Oceanside
- Existing Cape Meares Distribution Feeder
- Feeder
- New Cape Meares Feeder 51 Tie-in
- Option 3 Eckloff
- Wilson/Trask Substation Tie In

Proposed Oceanside Substation

Wilson River Substation

Tillamook

New Cape Meares Distribution Line Tie-in

Exhibit 201

131

Netarts Hwy-W

Netarts Hwy-S

101

Oregon Coast Hwy

Trask Subs

Google Earth

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Data SIO, NOAA, U.S. Navy, NGA, GEBCO

3 mi



Distribution Map

Map view of providing redundant power via distribution lines.
Option 3 as proposed by Tillamook PUD

Legend

- Existing Distribution Line Trask Sub to end of Eckloff Rd
- Existing Feeder 51
- New Distribution from Oceanside Substation to Netarts and Oceanside
- New Distribution Line Option 3 Eckloff to Hwy 131
- New Underground Dist Line Option 3
- Wilson/Trask Substation Tie In

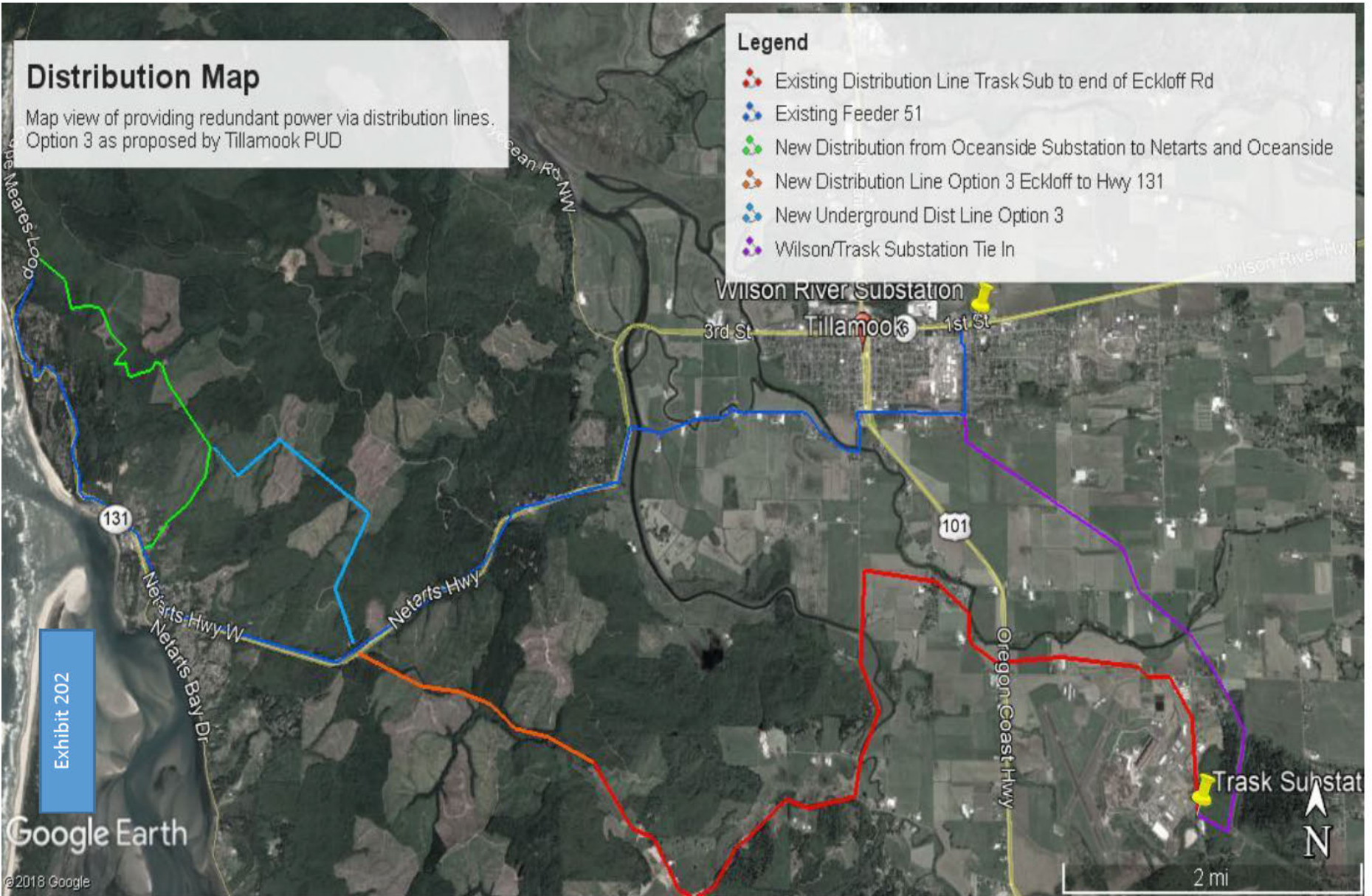


Exhibit 202

Google Earth

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