

## UTILITY RESPONSE TO PUGET SOUND ENERGY COMMENTS (August 5, 2024)

### UAC RECOMMENDED DRAFT UTILITIES CHAPTER, FEBRUARY 1, 2024

**PSE Comment 1:** Page 1 (vision for the future). PSE encourages the City to mention the importance of collaborating with utilities here, as well as in subsequent bullet points. Historically, working with utilities is sometimes considered at the later phases of development such as a request for service or even the siting infrastructure.

- Utility Response: The following new vision statement has been added to the Planning Commission Public Hearing DRAFT Utilities Chapter, August 9, 2024 to address this comment: [Additionally, Olympians benefit from the early and ongoing collaboration with private utility providers by City staff.](#)

**PSE Comment 2.** Private Utilities – Electricity and Natural Gas. Page 37. It is important to note that PSE has both existing and planned facilities that occur or will occur within the boundaries of the map. This includes both electric and natural gas systems and services located on private and public properties. As has been applied in the past, when constructing facilities, PSE will comply with the City’s regulations as part of its permitting process.

- Utility Response: Please see below response to PSE Comment 9 as this comment appeared to Utility staff to cover the same information.

**PSE Comment 3:** PU1.5. Page 6. PSE is a regulated utility that works within the guidelines and requirements of the WUCT as well as City codes and permitting standards.

- Utility Response: Thank you for your comment. PU1.5 is intended to apply to City owned utilities, therefore no changes to the Planning Commission Public Hearing DRAFT Utilities Chapter, August 9, 2024 have been made to address this comment.

**PSE Comment 4:** PU10.7. Page 19. PSE supports the City’s efforts to encourage low impact development and green infrastructure. It is important to coordinate such improvements especially within rights-of-way/franchise area where PSE may have existing infrastructure. We are an active participant in the implementation of the state’s Clean Buildings Act through Green Building Accelerator program.

- Utility Response: Thank you for your comment. The proposed policy is intended to encourage such partnerships. As such, additional changes to the policy are not needed at this time, but we note that the City-owned Utilities will consider this comment when designing (and constructing) low impact and/or green infrastructure projects within PSE’s franchise area.

**PSE Comment 5:** Page 23. Electricity. PSE is listed as the “only” provider of electricity. It may be more accurate to list PSE as the only ‘privately operated’ provider of electricity. Renewable energy such as solar is an option for citizens and businesses.

- Utility Response: The following change has been made in the Planning Commission Public Hearing DRAFT Utilities Chapter, August 9, 2024 to address this comment:  
Electricity: Puget Sound Energy (PSE) is the only privately operated provider of electricity to Olympia and its Urban Growth Area. PSE is an investor-owned utility, providing electricity to nine western and central Washington counties.

**PSE Comment 6:** GU16. Page 24. Potentially state: “Private utilities are located underground whenever possible to protect public health, safety and welfare.” Undergrounding does not always mean better reliability. There are hurdles associated with undergrounding that can disrupt service and make repairs more difficult and less timely.

- Utility Response: The following change has been made in the Planning Commission Public Hearing DRAFT Utilities Chapter, August 9, 2024 to address this comment: GU16 Private utilities are located underground whenever possible to protect public health, safety and welfare.

**PSE Comment 7:** PU17.2. Page 25. What is meant by “timely” notice? Will the City consider stating a notification timeline goal, such as 90 days prior to work beginning?

- Utility Response: Please see section 4B.175.F of the City of Olympia’s Engineering Design and Development Standards section 4B.175.F for a reference to notice requirements. Because including a notification timeline goal is more appropriate to be included in the City of Olympia’s Engineering Design and Development Standards, no changes have been made to address this comment.

**PSE Comment 8:** PU18.1. Page 25. We are interested in knowing how or if this policy affects PSE’s ability to maintain, operate or site its electric and natural gas facilities and services. How is “reasonable” defined in regard to compatibility with surrounding zoning? We wonder how this may affect both existing and future development of PSE’s facilities and services to address growth as well as ongoing energy transformation measures such as Distributive Energy Resources (DERs) and Battery Energy Storage Systems (BESS). It is important to note that similar to electric vehicle charging facilities, not all battery storage systems are identical. Consequently, one size does not ‘fit all’ when it comes to siting and permitting. Will the City be amending its code to address the siting of such facilities (e.g. BESS)?

- **Utility Response:** PU18.1 is meant to provide for separation of utility infrastructure/facility (e.g. a substation) from adjacent land uses. Olympia Municipal Code does this by requiring the use of fencing, landscaping, walls or the like to meet the compatibility provisions. Compatibility concerns include but are not limited to visual, noise or odor. As written, the Olympia Municipal Code provides flexibility based on what type of utility infrastructure/facility is proposed.

To address the comment, the following change has been made in the Planning Commission Public Hearing DRAFT Utilities Chapter, August 9, 2024: PU18.1. Locate private utility facilities near compatible adjacent land uses. City regulations will specifically [specify](#) that approval of new private utility facilities shall be reasonably compatible with the development of the surrounding properties. [The appropriate treatment may vary, based on the type of utility facility, but compatibility will consider things like noise, odor, and visual impacts. Treatments may include things like landscape screening, fencing, walls, or enclosure of equipment.](#)

**PSE Comment 9:** Page 36. Electricity and Natural Gas section. Unlike some other private utilities, providers of electricity such as Puget Sound Energy (PSE) are required to provide electricity upon demand and in accordance with Revised Code of Washington; Washington Administrative Code; and the “tariffs” on file with the Washington Utilities and Trade Commission (WUTC). To comply with its public service obligations, PSE must plan to extend or add to its electric facilities when needed. PSE owns, operates and maintains all electric transmission and distribution substations, as well as the electrical transmission and distribution lines within the City of Olympia.

This obligation does not apply to the delivery of natural gas, as it is considered an alternative fuel, rather than a necessity, as electricity is. In accordance with the laws and tariffs, PSE’s natural gas service is a demand-driven utility. PSE installs natural gas services for those

customers requesting service for new construction, as well as when customers convert from propane or oil to natural gas. PSE owns and operates all natural gas transmission and distribution mains, including gate stations within the City of Olympia.

The map of Puget Sound Energy's facilities is representative of existing and proposed major PSE electric and natural gas facilities but does not show distribution lines and ancillary equipment associated with services.

- Utility Response: To address the above information, the following changes have been made in the Planning Commission Public Hearing DRAFT Utilities Chapter, August 9, 2024:

Unlike some other private utilities, providers of electricity such as Puget Sound Energy (PSE) must provide electricity upon demand and in accordance with [Revised Code of Washington; Washington Administrative Code; and the "tariffs"](#) on file with the Washington Utilities and Trade Commission (WUTC). To [comply with fulfill](#) its public service obligations, PSE must plan to extend or add to its [electric](#) facilities when needed. [PSE owns, operates, and maintains all electric transmission and distribution substations, as well as the electrical transmission and distribution lines within the City of Olympia.](#)

~~However, t~~[his obligation does not apply to the delivery of natural gas, as it is considered an alternative -fuel-convenience, rather than a necessity, as electricity is. In accordance with the laws and tariff's, PSE's PSE-natural gas service is a demand-driven utility-and, as such, is prohibited from passing on the cost of new construction to existing customers. Instead, it PSE](#) installs natural gas service for [those customers requesting service for](#) new construction, ~~as well as -and-~~ when customers convert from ~~propane~~[electricity](#) or oil to natural gas. PSE owns and operates all ~~natural gas-electrical~~ transmission and distribution ~~mains, including gate stations~~ [stations, as well as the transmission and distribution lines](#) within the City of Olympia.

[The map of Puget Sound Energy's facilities is representative of existing and proposed major PSE electric and natural gas facilities but does not show distribution lines and ancillary equipment associated with services. The map below shows existing and proposed major PSE electric and natural gas facilities, but does not show distribution lines.](#)

