

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Friday, July 07, 2006 6:14 PM
To: corridoreisarchives,
Subject: Preliminary Draft Corridor Map Comment M0058

Attachments: PacifiCorpComments_July2006_M0058.pdf



PacifiCorpComments_July2006_M0...

Thank you for your comment, R. Jeffrey Richards.

The comment tracking number that has been assigned to your comment is M0058. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 7, 2006 06:13:40PM CDT

Preliminary Draft Corridor Map Comment: M0058

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Privacy Preference: Don't withhold name or address from public record
Attachment: S:\SHARED\REMgt\RMP_Project\West-wide Corridor PEIS
\PacifiCorpComments_July2006.pdf

Comment Submitted:

Comment letter attached. An additional PDF of a map will be included on second attachment since this only allows one.

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Preliminary Draft Corridor Map Webmaster at
(630)252-6182.



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July 10, 2006

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: PacifiCorp Comments on Issues Relating to the Preliminary Draft Map of Potential Energy Corridors on Federal Lands

PacifiCorp, a subsidiary of MidAmerican Energy Holdings Company, appreciates the continuing opportunity to participate in the West-wide Energy Corridor process. PacifiCorp respectfully submits these comments regarding potential corridor routes and issues associated with those routes as shown on the preliminary maps made available for public review June 9, 2006.

PacifiCorp is one of the largest western electric utilities, serving approximately 1.7 million residential, commercial and industrial electric customers throughout its six state service territory (Utah, Oregon, Wyoming, Idaho, Washington, and California) and is committed to serving its customers with safe, reliable and economically competitive electricity, including renewable energy. PacifiCorp owns and operates approximately 16,000 miles of high voltage electric lines and 45,000 miles of overhead distribution lines that traverse over 55.7 million acres of federal lands within PacifiCorp's service area. In total, PacifiCorp's transmission and distribution assets and generation and mining facilities are spread across 10 of the 11 western states included in the Programmatic Environmental Impact Statement ("PEIS"). The ability to transport these resources long distances across federal lands to expanding load centers is critical in meeting ever increasing electric load demands.

PacifiCorp strongly supports the development and federal designation of energy corridors on federal lands across the western U.S, consistent with Section 368 of the Energy Policy Act of 2005 ("Act"). The corridor designation process, if properly implemented, can play a critical role in assuring that necessary energy infrastructure, particularly electric transmission, is developed and utilized in a timely, efficient and environmentally responsible manner to meet the country's growing energy demands. In addition PacifiCorp supports the development and implementation of those potential energy corridors depicted on the June 2006 status map and acknowledges the efforts put forth by the Departments of Energy and Interior in establishing energy corridors throughout the West.

PacifiCorp offers the following comments to supplement the PEIS-related recommendations PacifiCorp provided the Department of Energy ("DOE") on November 21, 2005.

First, PacifiCorp submits that the preliminary energy corridors, as identified on the maps on the West-wide Energy Corridor website, are suboptimal from a reliability criteria perspective because they do not appear to be wide enough to accommodate multiple projects, particularly with respect to adjoining electric transmission lines. As supported by the Western Electric Coordinating Council recommendations, PacifiCorp believes that interconnected transmission lines should be located sufficiently far apart to minimize the risk of simultaneous common mode outages resulting from weather, fire, or other events. The 3,500 foot corridor width currently under consideration may, in some areas, result in inadequate separation between new and existing lines, and may preclude multiple lines from being sited within a single corridor due to reliability concerns. This is inconsistent with Section 368 of the Act that requires improved reliability for existing and future electric transmission and distribution facilities. Accordingly, PacifiCorp requests that energy corridor widths be established to allow for a minimum of one mile of separation between major high voltage transmission lines to reduce the risk of multiple line outages due to a single event such as fire, weather, or other events. Given the projected capacity requirements for the proposed Frontier and Trans-West Express projects, multiple new lines out of Wyoming and across Utah and Nevada will be required. Wider corridors would allow more than one high capacity line to be efficiently located within a single existing or future corridor.

Equally important, where it is beneficial for multiple energy systems and facilities to share the same corridor, width designations must be wide enough and flexible enough to accommodate all compatible uses, and allow for expansion to accommodate future energy needs. These new energy corridors must be dedicated exclusively for the purpose of transmitting energy; no other development or incompatible uses should be allowed within those designated boundaries.

Second, the implementation of Sections 368 and 1221 of the Act are insufficiently integrated to assure needed electric transmission infrastructure will be properly planned, developed and sited. Specifically, to be meaningful, the designation of energy corridors on federal lands must be coordinated with corridor designations on non-federal lands. For instance, designations under both sections of the Act may be required to support the construction of large-scale transmission projects like the proposed Frontier line that will span both federal and non-federal lands.

Finally, PacifiCorp is concerned that the proposed energy corridors, while beneficial, may not be sufficient in location or number to adequately provide for new transmission lines through federal lands needed to access renewable and conventional resources. Across PacifiCorp's system, new coal and wind resources are being developed in remote areas. The electricity generated from these new plants will be transported long distances to regional load centers. Given the substantial distances between the projected sources and their destination markets, to say nothing of the predominance of federal lands in the west, meeting the anticipated increase in demand to transport thermal and renewable energy will require construction of new transmission facilities and/or upgrades to existing facilities, many of which traverse federal agency managed public lands. For example, PacifiCorp's proposed new transmission lines from a point near Buffalo, Wyoming, to the Jim Bridger generation plant and from the Naughton generation plant to a

switching station near Evanston, Wyoming, (Corridors A and B in the attached map) will cross federally managed public lands.

Jointly with Sierra Pacific Power, PacifiCorp also requests that a corridor be designated between the area west of Tooele, Utah, and Gardner, Nevada, in order to support both utilities' ability to transport low-cost resources to the growing Las Vegas and Salt Lake City load centers (Corridor C). An additional corridor is also needed running along a north-south route west of the Oquirrh Mountains from PacifiCorp's Mona switchyard in Juab County to the area north of Tooele and west of Salt Lake City proper (Corridor D). Finally, a corridor is needed between Craig/Hayden, Colorado, and Park City, Utah, to support a proposed new transmission line that will deliver generation resources to the growing load center in that area (Corridor E).

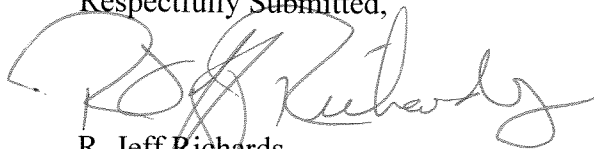
In summary, PacifiCorp believes that with the modifications described above, the PEIS effort can be implemented in an appropriately balanced manner that will benefit energy developers, transmission providers and consumers alike, while reducing environmental impacts and conflicts with other uses of federal lands.

PacifiCorp appreciates the opportunity to comment. Any questions concerning these comments, or requests for additional information may be directed to the following contacts:

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Respectfully Submitted,

A handwritten signature in black ink, appearing to read "R. Jeff Richards", is written over a large, faint circular stamp or watermark.

R. Jeff Richards
Senior Counsel

Enclosure

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Friday, July 07, 2006 6:16 PM
To: corridoreisarchives,
Subject: Preliminary Draft Corridor Map Comment M0059

Attachments: Corridors_July2006_M0059.pdf



Corridors_July2006_
M0059.pdf (...)

Thank you for your comment, R. Jeffrey Richards.

The comment tracking number that has been assigned to your comment is M0059. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 7, 2006 06:15:52PM CDT

Preliminary Draft Corridor Map Comment: M0059

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Attachment: S:\SHARED\REMgt\RMP_Project\West-wide Corridor PEIS\Corridors_July2006.pdf

Comment Submitted:

Second attachment that includes a map of proposed corridors referenced in our comment letter submission.

Questions about submitting comments over the Web? Contact us at:
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(630)252-6182.

PacifiCorp Transmission

PacifiCorp
Proposed Energy Corridors
July 2006

▲ Generation Projects	Federal Ownership
■ PacifiCorp Proposed Corridor	■ Bureau of Indian Affairs
Transmission Lines	■ Bureau of Land Management
— 138	■ Bureau of Reclamation
— 230	■ Department of Defense
— 345	■ US Forest Service
— 500	■ Fish & Wildlife Service
	■ National Park Service

