



**State of Montana**

***Beaverhead, Deer Lodge, Powell, & Silver Bow Counties***

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

0029

November 11, 2005

To Whom It May Concern:

First, we would like to thank the Department of Energy and Bureau of Land Management, as co-lead agencies, and the US Forest Service for accepting public comment and starting the process of compiling information necessary for the designation of energy transportation corridors. This is an important process, critical to the orderly development of Montana's energy resources and to ensure the reliability of energy supply in the northwestern United States.

Anaconda-Deer Lodge, Powell, Butte-Silver Bow, and Beaverhead Counties are already the site of a number of energy transportation facilities. NorthWestern Energy (NWE) has a 16-inch natural gas pipeline in place and numerous transmission lines ranging in size from 100 kilovolts to 230 kilovolts, entering the region from all four points of the compass and converging at the Mill Creek substation east of Anaconda. The Bonneville Power Administration also has a 230-kilovolt line and substation in the area as well.

When designating potential energy corridors for the future, we ask the lead agencies to consider designating every existing transmission corridor with an electric transmission line greater than or equal to 161 kilovolts as a primary transmission corridor. Also, as a matter of policy, we feel a rule should be adopted which creates a preference for rebuilding or upgrading

those lines before constructing new facilities. The environmental effects of existing transmission lines have already taken place. Service roads and other facilities needed to upgrade, maintain, or repair the transmission lines are present, and there should be no need to do an extensive environmental analysis. In fact, the upgrade of existing transmission lines should be categorically excluded from National Environmental Policy Act review.

We strongly endorse designating an electric transmission corridor beginning at the 500 kV substation in Garrison, Montana, moving south through Powell, Deer Lodge, Silver Bow, and Beaverhead Counties into southern Idaho as a way of moving power to states south and west of Montana, and to give Montana greater opportunity to import electricity produced in other states.

NorthWestern Energy has designated this corridor as one option for connecting the Colstrip 500 kV transmission lines with transmission in southern Idaho.

A proposed corridor from Garrison to southern Idaho offers several advantages over other potential routes, including:

- (a) There are existing transmission lines along this corridor which can be readily expanded to handle new lines or a substantial upgrade of an existing facility.
- (b) The route avoids major population centers and areas where there is extensive suburban development such as the Helena and Gallatin Valleys.
- (c) The route largely crosses land used for livestock versus crop agriculture (i.e., grazing land) and reduces the amount of potential impact on agricultural operations.
- (d) The route does not infringe upon wilderness areas, national parks, or other specially designated areas set aside to protect wildlife, cultural or recreational

amenity values. Most of the federal land that would be crossed by this corridor consists of grazing land.

- (e) The route crosses counties that are in great need of economic development and this corridor will likely enjoy more governmental and public support than other potential routes.

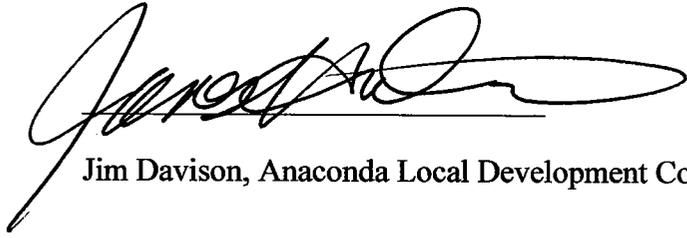
Thank you for the opportunity to comment. We look forward to working with DOE and BLM as this process continues.

Sincerely,

***For Anaconda-Deer Lodge:***



Linda Bouck, Interim CEO



Jim Davison, Anaconda Local Development Corp.

***For Beaverhead:***

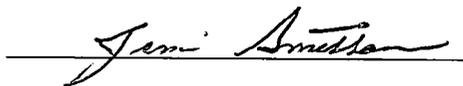


Mike McGinley, Chair, Beaverhead County Commission

***For Butte-Silver Bow:***



Paul Babb, Chief Executive Officer



Jim Smitham, Butte Local Development Corp.

***For Powell:***



Dwight O'Hara, Chair, Powell County Commission

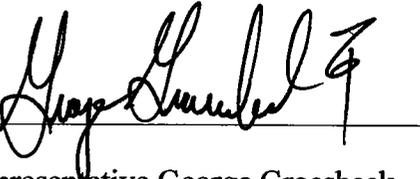
**For the Legislative Delegation:**



Representative Debby Barrett



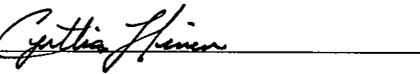
Senator Steve Gallus



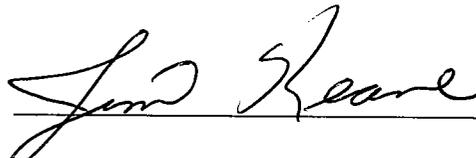
Representative George Groesbeck



Senator Dan Harrington



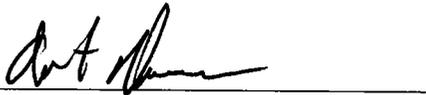
Representative Cindy Hiner



Representative Jim Keane

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Senator Jesse Laslovich



Representative Art Noonan



Representative Jon Sesso



Representative Dan Villa



Representative John Ward