

From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80052
Date: Monday, November 28, 2005 3:41:44 PM
Attachments: [PSCO-sec368-PEIS_80052.doc](#)

Thank you for your comment, Rick Thompson.

The comment tracking number that has been assigned to your comment is 80052. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 03:41:38PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80052

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Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Programmatic EIS
Webmaster at (630)252-6182.

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Julia Souder
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
1000 Independence Avenue, SW
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November 28, 2005

SENT VIA EMAIL

Re: West-Wide Energy Corridor Programmatic Environmental Impact Statement per §368 of the Energy Policy Act of 2005

Xcel Energy Services, Inc. ("XES") offers the following comments to the Notice of Intent issued on September 28, 2005 by the Department of Energy (DOE) and Bureau of Land Management (BLM) announcing their intention, pursuant to Sec. 368 of the Energy Policy Act of 2005, to prepare a programmatic environmental impact statement (PEIS) in connection with the designation of energy corridors on Federal lands in 11 Western states for oil, gas and hydrogen pipelines and electricity transmission and distribution facilities.

XES is the service company for Xcel Energy Inc. ("Xcel Energy"), a Minnesota corporation and a registered holding company under the Public Utility Holding Company Act of 1935. XES performs a variety of administrative and general services for its affiliates within the Xcel Energy holding company system, including the Xcel Energy Operating Companies: Public Service Company of Colorado ("PSCo"), Northern States Power Company ("NSP"), Northern States Power Company (Wisconsin) ("NSPW"), and Southwestern Public Service

Company ("SPS") (NSP, NSPW, PSCo and SPS are collectively referred to as "Operating Companies"). Among other things, XES routinely appears in proceedings, such as this Notice of Intent, on behalf of the Xcel Energy Operating Companies.

PSCo is a Colorado corporation and a combination gas and electric utility providing electricity and natural gas to approximately 1.2 million electric and natural gas customers in various geographic areas across the State of Colorado. PSCo is a vertically integrated company, generating electricity, then transmitting and distributing it to nearly 80% of the states population. PSCo also provides natural gas distribution services to a similar fraction of the state's population. In 2005, the PSCo peak electric demand was 6,785 MW utilizing over 3,710 miles of 69kV and above transmission lines. A significant fraction of these facilities are located on federal lands authorized under permit by the responsible Federal Land Manager.

XES would like to thank DOE, the BLM and the United States Forest Service (USFS) for the opportunity to make comments on the PEIS, both at the public meeting held in Denver on October 28 and through these written comments.

As a first step, DOE should undertake an inventory of all existing energy corridors comprising electric transmission and gas transmission facilities. Much of that inventory is already included for Colorado in the "Western Regional Corridor Study" prepared by the Western Utility Group and adopted by the Bureau of Land Management for their database. This step is critical for the

continued utilization of these facilities as necessary infrastructure to deliver energy to Colorado's citizens, both today and in the foreseeable future.

In the PSCo service territory, the Front Range of Colorado is experiencing significant load growth and is driving the need for substantial additional energy infrastructure. PSCo will continue to explore acquiring power supply alternatives from a variety of geographic locations, including accessing new power resources from the north in east-central Wyoming and from the west across the continental divide. Both of these alternatives may cross significant portions of federal land.

Although Public Services long range plans are preliminary and subject to revision, we do know that siting of new electric transmission lines within the state of Colorado will require the utilization of existing energy corridors, wherever possible, to minimize environmental impacts on both private and public lands. PSCo cooperates with other multi-state utilities for long-range transmission planning through the Colorado Coordinated Planning Group. Many of these utilities, including PSCo, share ownership in common interstate and intrastate facilities. To respond to those needs, the PEIS should be specific in proposing new energy corridors – whether they are a conversion of existing rights-of-way into corridors that can accommodate new facilities, upgrades of existing facilities or entirely new corridors. The PEIS must result in the designation of energy corridors in the federal agencies land use plans before incompatible uses arise within the planning area.

Due to the wide divergence of geography and land uses in Colorado and adjoining states, energy corridors for new facilities must require a minimum

separation of 200 feet between facilities to accommodate different voltages and tower designs. If necessary, corridors should be designated as wide as a mile to provide for the use of multiple energy facilities in one corridor.

Additionally, sufficient ROW width is required to accommodate access roads for maintenance vehicles and allow for vegetation management and physical clearance considerations. Access roads may deviate significantly from the location of a specific gas or electric transmission facility, due to terrain or other restrictions. Access is critical to the continued operation and maintenance of the transmission facility and must be included in any energy corridor designation.

Sufficient facility separation is needed to minimize the possibility of simultaneous outages of multiple transmission facilities caused by a single event that could adversely affect system reliability. Adequate physical separation is required to prevent a failure of a transmission line falling laterally and affecting an adjacent transmission line with adverse reliability consequences.

Local public agencies should be encouraged to participate in the PEIS in order to incorporate local public agency needs and energy development plans.

PSCo is required to connect substantial new renewable energy resources within the next fifteen years as a result of a state referendum implementing a renewable portfolio standard for electric generation resources. These resources are typically located in areas remote from load center that use the power generated by the renewable energy facility. Such resources require long generation tie lines to be built and connected to the utility grid to deliver their

output to loads. It is likely such resources will require the use of corridors on federal land. Sufficient accommodation for these facilities should be incorporated into the PEIS, as suggested by the goals and recommendations of the Western Governor's Association's Clean and Diversified Energy Advisory Committee.

PSCo owns existing transmission facilities through federal lands that include parks, preserves and forests. The lead agencies should include designation of corridors around these facilities that would preserve current uses and allow siting of new facilities adjacent or near those facilities.

Interagency protocols for the designation and use of corridors need to be developed to provide for the smooth licensing and permitting process for new facilities. At a minimum, such permitting protocols should be established between the BLM, USFS and U.S. Fish and Wildlife Service.

Changes arising from population growth, economic development, or other land use changes should be taken into account as designations of energy corridors are developed. Energy corridor designations should be flexible to accommodate such changes over time. The DOE should provide for a periodic review of designated corridors through a coordinated process similar to the initial designation of corridors.

On behalf of PSCo and the other Xcel Energy Operating Companies, we appreciate the opportunity to provide these comments and urge their adoption in the final PEIS.

Sincerely,