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Fax

To: Julia Souder, Office of Electricity Delivery
and Energy Reliability **From:** John Larrea

Fax: **Pages:** 4, including cover

Phone: 916-448-3252 **Date:** July 11, 2006

Re: Preliminary Draft Corridor Map comments **CC:**

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

• **Comments:**

Julia,

Please discard the July 7, 2006, version of Williams comments. As I indicated in my phone message I submitted the wrong version.

Please substitute the July 10, 2006 version. This is the corrected version of Williams' comments.

Please notify me if there is a problem. I can be reached at the following numbers:

Office – 916-448-3252

Mobile – 916-996-3158

Email – john.larrea@williams.com

Thank you and sorry about the mix up.

John



John G. Larrea
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July 10, 2006

Ms. Julia Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585;

Re: DOE/EIS-0386 – Comments on Designation of Energy Corridors on Federal Lands

Dear Ms. Souder:

With the release of the Preliminary Draft Energy Corridor Maps, Williams remains supportive of the DOE's efforts in the preparation of a Programmatic Environmental Impact Statement (PEIS) for designation of energy corridors in the Western Region. However, because the ability of the grid to deliver energy depends upon all energy sources and transmission systems, Williams' concerns and issues run toward ensuring compatibility of designated corridors for multiple-use and establishment of a functional procedure for identifying qualified facilities.

Site Corridors To Mitigate Exclusive Use

Federal corridors should not be held exclusive for one type of facility. The demands of energy transmission, especially in the Western Region, require corridors that accommodate, to the greatest extent possible, both pipelines and power lines. However, the distances and terrain involved in such planning will complicate multiple-use in some cases. Williams urges the DOE to adopt criteria granting multiple-use in siting corridors but would not require a project to be built in a corridor if doing so would add significant cost or economic burden to the project.

One of the benefits to be derived from the designation of energy corridors will be from multiple-uses. Multiple-use is possible, in large part, due to industry developments that have provided a number of civil and electrical engineering solutions that have increased the compatibility of pipelines and power lines, especially in congested corridors. Siting criteria used by the DOE in identifying corridors should take into account these developments and efforts should be made to identify and designate corridor routes that will take advantage of this existing and developing technology to ensure the greatest compatibility.

In addition, definitions should be set for what facilities will qualify for inclusion in a corridor. These definitions necessarily include line size, capacity, location, function, etc. Adequate

workspace and safety precautions must be considered and allowed for in the corridors so that all reasonable care is taken to prevent damage to or interruptions in the use of existing facilities in the corridor.

Design Flexibility Into Siting Procedures

The corridors must still allow for flexibility in siting new facilities. Although established corridors can be very useful, companies must be able to build facilities via the shortest, most 'constructible' route to prevent undue burden on the customers' rate payers. In addition, companies must have access to new energy production areas without undue delay or red tape. Procedures must be included in the siting process to allow siting outside of the corridors in order to accommodate new production areas and market concerns as well as instances where existing corridors may be full or no longer able to accommodate new facilities in a safe or environmentally responsible manner.

Streamlined Procedures

In conjunction with the identification of new corridors, development of sound and effective streamlined procedures for siting facilities will be vital in ensuring successful corridor development. The siting process associated with the establishment of new corridors must streamline the approval of projects without circumventing or eliminating necessary surveys and reviews. Such siting procedures should include:

- Clearly defined criteria;
- Elimination of duplicate environmental analyses;
- Process for FLM/PEIS approval on jurisdictional crossover without additional field surveys; delays in reviewing studies by multiple agencies or approving decisions.
- Incorporate NEPA categorical exemptions, where feasible.
- Nondiscriminatory consideration in siting process for all energy sectors.
- Notification of existing corridor inhabitants prior to granting access.
- Permit terms designed to ensure infrastructure alignment with the useful life of that infrastructure.

Systematic Review

The long-term aspects of the energy corridor designations will necessitate the periodic review of corridors in order to accommodate changes in circumstances such as new production and/or market areas, corridor capacity, etc.. Any review or modification of corridors must include companies that have facilities in or near the existing or proposed corridor.

Security

Homeland Security concerns should be fully addressed in the designation of new corridors or the expansion of existing corridors. One area of particular concern is the protection of Critical Energy Infrastructure Information (CEII).

Impacts on Current Projects

Some areas identified as potential corridor sites may already be developed or utilized by existing facilities. In such cases, the corridor identification process must not hold up current, existing or

newly proposed projects that have been announced or are underway when the corridor process becomes effective.

Corridor Map Addition

Williams recommends that the proposed corridor map be updated to include additional areas currently being used by transmission systems. One, in particular, is the existing corridor running east and west in southern Wyoming largely along the Interstate 80.

Please contact me if you have questions about or would like to discuss any of these points.

Sincerely,



JOHN LARREA
Williams State Governmental Affairs