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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

Re: West-wide Energy Corridor Programmatic Environmental Impact Statement Maps

Ladies and Gentlemen,

Kern River Gas Transmission Company ("Kern River"), a subsidiary of MidAmerican Energy Holdings Company, appreciates the continuing opportunity to participate in the West-wide Energy Corridor process for developing and maintaining energy corridors in the eleven western states. Kern River owns and operates 1,679 miles of interstate natural gas pipeline through the states of Wyoming, Utah, Nevada and California. Kern River delivers more than 1.7 billion cubic feet of natural gas per day to customers along its pipeline system, supplying approximately 75% of the natural gas consumed in the Las Vegas area and nearly 25% of all natural gas consumed in California. On November 28, 2005 Kern River submitted comments on the West-wide Energy Corridor Programmatic Environmental Impact Statement ("PEIS"). Kern River also contributed oral comments at the scoping meetings in Salt Lake City and Las Vegas. Kern River respectfully submits these comments regarding route issues associated with the preliminary maps.

Kern River has reviewed the maps of preliminary energy corridors on Federal lands and is concerned that the network of corridors proposed may not be sufficient to serve the energy needs of southern California and the greater Las Vegas area.

It appears much focus has been devoted to the placement of electric transmission lines in designated corridors. Kern River acknowledges the importance of electrical generation and transmission. Kern River also understands that to supplement electrical generation fuel needs, a robust natural gas system must also be in place. Currently Kern River supplies natural gas as a fuel choice for approximately 8000 megawatts of directly connected generation with the majority of this generation in the southern Nevada and southern California areas. Kern River serves additional generation capacity through city gates of connected natural gas distribution systems.

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The preliminary energy corridors, as outlined on the maps at the West-wide Corridor web site, do not accommodate energy corridors near metropolitan areas where energy demand is most significant and appear to ignore many existing energy transmission systems. The proposed PEIS should evaluate any constraints or restrictions that could impede expanded service, such as one identified by Kern River during numerous studies of route locations for pipeline expansion through the Las Vegas metropolitan area. Specifically, there is a corridor designated for specifically selected electric transmission through the Sunrise Mountain Instant Study Area. This area needs to be added to the West-wide corridor PEIS study and should be designated as a multiple use corridor. Without this designation, providing expanded natural gas transportation from the producing basins of the Rocky Mountain area to the market areas of the southwest becomes extremely difficult. The Las Vegas Office of the Bureau of Land Management in the Proposed Las Vegas Resource Management Plan and Final Environmental Impact Statement (May 1998) and the Record of Decision in October 1998 approved the Las Vegas Resource Management Plan. The Las Vegas Resource Management Plan supports a corridor through the Sunrise Mountain Instant Study Area thus recognizing that a corridor through the Sunrise Mountain Instant Study Area appears to be one of the last remaining available corridors through the Las Vegas area. Growing energy demand necessitates a corridor through this area.

The PEIS should specifically address this situation. Kern River supports the actions the Bureau of Land Management has taken to date. To further assist in the development of corridors where existing infrastructure will eventually need to be expanded, Kern River is attaching a map of the electric transmission rights of way east of the Las Vegas valley. This corridor should be designated as a multiple use energy corridor. Should congressional action continue to be necessary to accommodate multiple uses of this corridor, Kern River believes the PEIS process should be structured in a manner to facilitate this action.

Similar constraints exist with corridors in the west being bound by wilderness study areas which the corridors intersect. The Kern River pipeline route and those proposed areas previously discussed should be included in any corridor designations.

Thank you for the opportunity to comment on the scope of the West-wide Energy Corridor PEIS maps. Kern River will make a representative available should questions arise or further information is needed.

Respectfully,

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