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TRANS-ELECT™

North America's Electric Transmission Company™

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: Comments on Preliminary Energy Corridor Map

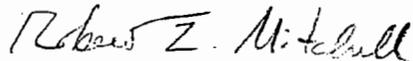
Trans-Elect, Inc., the nation's first independent transmission company, is actively engaged in transmission development activities throughout the West. In the furtherance of such activities, Trans-Elect is an active participant in DOE's Energy Corridor and National Interest Electric Transmission Corridor (NIETC) processes, and has provided input via DOE sponsored workshops, public meetings, and written testimony (see attached).

Trans-Elect has entered into a public/private partnership with the Wyoming Infrastructure Authority (WIA) and the Western Area Power Administration to consider the expansion of transmission capacity between Eastern Wyoming and the Colorado Front Range along the TOT 3 path (see press releases on the WIA's website: [www.wia.wy.gov](#)). The TOT 3 path generally encompasses a 50 mile wide swath between Gillette, Wyoming and Denver, Colorado passing on the east side of Cheyenne, Wyoming and the Colorado Front Range. This is one of the three projects recommended in the Rocky Mountain Area Transmission Study (RMATS), a five-state, stakeholder-driven process that was initiated by the Governors of Wyoming and Utah and completed in 2004 – a project that would bring low-cost clean coal and wind energy to Colorado load centers. As such, we believe there is merit in having the project's transmission route included in the DOE's designation of energy corridors and join with the WIA and the Western Business Roundtable in bringing our activities to your attention (letters submitted separately).

The preliminary Energy Corridor Map posted on DOE's website incorporates the northern portion of the TOT 3 path (between Gillette and Douglas, WY), but appears to exclude the southern portions of the TOT 3 path. The proposed TOT 3 route includes generally favorable terrain for transmission construction and would have few, if any, adverse environmental impacts. We would appreciate your consideration of the designation of an energy corridor in the TOT 3 area, recognizing that there are only limited and scattered amounts of Federal land involved.

Should you have any questions about our comments or the alignment of the proposed energy corridor, please contact me at your earliest convenience. Thank you for your consideration.

Sincerely,



Robert L. Mitchell, Managing Director and Chief Development Officer

cc: Steve Waddington, Wyoming Infrastructure Authority
Michael S. HacsKaylo, Western Area Power Administration
Jim Sims, Western Business Roundtable
Jerry Vaninetti, Trans-Elect



March 6, 2006

Mr. Kevin Kolevar, Director
Office of Electricity Delivery and Energy
Reliability, OE-20
Attn: EPACT 1221 Comments
U.S. Department of Energy
Room 6II-050
1000 Forestall Building
Washington, DC 20585

Dear Mr. Kolevar:

Trans-Elect, Inc. appreciates the opportunity to comment on the NIETC process. While Trans-Elect has transmission business and development interests at sites scattered throughout the United States and is supportive of the NIETC process, the comments set forth herein pertain specifically to the TOT 3 transmission constraint located on the Wyoming-Colorado border. As such, our comments are supportive of the comments filed with your offices by the Wyoming Infrastructure Authority on March 3, 2006 as well as those filed by the Western Business Roundtable that will be filed on March 6, 2006.

The TOT 3 transmission constraint limits the export of low-cost coal and wind power from Wyoming to load centers along the Colorado Front range in Colorado. Limitations in power flows along the TOT 3 transmission path is a long-standing problem that has been identified in a number of stakeholder studies including the recently completed Rocky Mountain Area Transmission Study (RMATS). The elimination of the TOT 3 constraint was recommended in RMATS as one of three high-priority projects for the Rocky Mountain States. RMATS estimated that the constraint could be relieved with the construction of a 250 mile-long 345 kV transmission line for \$318 million which would increase the TOT 3 transfer capacity by 750 MW. In order to address the resolution of the TOT 3 transmission constraint, a public/private partnership has been formed by the Wyoming Infrastructure Authority, Trans-Elect, and Western Area Power Administration (www.wyia.org/projects).

We have been tracking the evolution of the NIETC process and conclude that the TOT 3 project meets many of the criteria that have been identified as potential criteria for NIETC designation, as follows:

- It would reduce the risk of significantly higher rates or other costs for consumers;

- It would facilitate economic development and strengthen the economy along the corridor and particularly at the end markets which would otherwise be constrained by the lack of adequate or reasonably priced electricity;
- It would improve the reliability of the regional transmission grid;
- It would increase fuel diversity so that customers are not unduly dependent on "at-load" generation resources;
- It facilitates access to some of the strongest wind resources in the West to meet Colorado's Renewable Portfolio Standards and customers' demand for environmentally-friendly power; and
- It would provide a stimulus to economic development in a thinly populated area which has limited alternatives for economic development.

We look forward to working with DOE in the NIETC process. Should you have any questions concerning our comments or require further input, please contact me at your earliest convenience.

Sincerely,



Robert J. Mitchell
Managing Director

cc: Steve Waddington, Executive Director, Wyoming Infrastructure Authority
Jim Sims, Executive Director, Western Business Roundtable
Michael S. HacsKaylo, Administrator, Western Area Power Administration
Robert Kennedy, Restructuring Manager, Western Area Power Administration