



Kris R. Hohenshelt
Manager, Land & Environment
P.O. Box 71400
Salt Lake City, UT 84171-0400
Tel: 801-937- 6133

November 28, 2005

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

Ladies and Gentlemen,

Kern River Gas Transmission Company (Kern River), a subsidiary of MidAmerican Energy Holdings Company, appreciates the opportunity to participate in the scoping process for developing and maintaining energy corridors in the west. Kern River respectfully submits these comments on issues which should be considered in the preparation of the West-wide Energy Corridor Programmatic Environmental Impact Statement.

Kern River owns and operates 1,679 miles of interstate natural gas pipeline through the states of Wyoming, Utah, Nevada and California. By state, 154 miles are located in Wyoming, 712 miles in Utah, 275 miles in Nevada and 538 miles in California. Approximately 850 miles are located on federally managed lands. The pipeline consists of 1,310 miles of 36 inch diameter steel pipe and 219 miles of 42 inch diameter pipe. The remaining miles are 30 inch diameter or less. The Kern River system also has four compressor stations located in Wyoming, four located in Utah, two in Nevada and one in California. These compressor stations are located along the pipeline system and comprise approximately 286,000 horsepower. Kern River delivers more than 1.7 billion cubic feet of natural gas per day to customers along the pipeline system. Because Kern River transports natural gas in interstate commerce, Kern River is regulated by the Federal Energy Regulatory Commission under the Natural Gas Act. This jurisdiction allows the Federal Energy Regulatory Commission to review, approve and certificate pipeline facilities and the routes and locations of these facilities. The Federal Energy Regulatory Commission acts as the federal lead agency with the Department of Interior Bureau of Land Management, the Department of Agriculture Forest Service, the Department of Defense and other federal agencies cooperating on federal lands.

Kern River files applications for rights of way on federal lands under the Mineral Leasing Act, thereby designating the Bureau of Land Management as the lead agency in issuing right of way grants on federal lands in cooperation with the other land management agencies.

The proposed Programmatic Environmental Impact Statement should assess corridors with traditional multiple use principles used. Corridors should be studied that can accommodate not only electric transmission lines, but pipelines and other energy infrastructures as well. Corridors should also be established to accommodate not only multiple uses but also multiple numbers of facilities. Corridor width should be established that is sufficient for compatible use between multiple electric transmission lines and multiple pipelines. Corridors should be developed with a width from 1,500 feet to 3000 feet depending on site specific resource issues. Narrow corridors may restrict long-term energy supply growth. Corridor designation should also account for ancillary facilities associated with energy transmission. Natural gas pipelines require compression facilities that will require sites of approximately 25 acres.

Energy corridors have been established through the land use planning process for years, but an intrinsic flaw in the process excludes the ability to continue corridors through private, local and state lands. The Programmatic Environmental Impact Statement should address the mechanisms that may be available for the establishment of contiguous corridors on a regional basis taking into account lands that are not federally managed. City and County governments must be brought into the process and encouraged to become firm stakeholders in the process. Energy interests are directed and counseled to utilize established corridors but the feasibility becomes very difficult when the corridor may not exist on either side of public lands. Corridors that can accommodate the public land and urban interface are needed.

The proposed Programmatic Environmental Impact Statement should evaluate any constraints or restrictions that could impede the designation of corridors. More specifically many corridors are restricted by competing land use designations. Many areas of the west are experiencing unprecedented growth. The Las Vegas metropolitan area is one such location. The Las Vegas area is one of the fastest growing regions in the United States. Urban growth and congestion has made it very difficult to locate major interstate energy systems, and in particular large diameter pipelines. Kern River has studied numerous route locations for pipeline expansion through the Las Vegas metropolitan area. In the Las Vegas area there is a corridor that is used for electric transmission through the Sunrise Mountain Instant Study Area. This area supposedly has the same protections as a Wilderness Study Area, but through congressional actions, most recently the Clark County Conservation of Public Land and Natural Resources Act of 2002 (Clark County Act), a specific electric transmission project has been allowed a corridor through the Sunrise Mountain Instant Study Area. This corridor can only accommodate what congress has specifically allowed. This position has been affirmed by the Department of Interiors' Solicitor.

The Bureau of Land Management has supported the use of multiple use corridors. 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 approving the Las Vegas Resource Management Plan supported the multiple use corridor concept. The Bureau of Land Management proposed in the Resource Management Plan that a corridor through the Sunrise Mountain Instant Study Area, be a "1,400 foot wide (corridor) from the north side of Sunrise Instant Study Area south through Rainbow

West-wide Energy Corridor Programmatic Environmental Impact Statement
Page 3

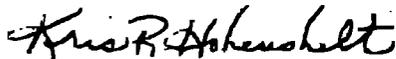
Gardens to the Lake Mead crossover". The Bureau of Land Management's final Resource Management Plan and Environmental Impact Statement proposed to create a corridor similar to that which Kern River seeks with some variation.

In the 2002 Clark County Act, Congress did not follow the Resource Management Plan recommendation and rather than designating a 1,400 foot wide corridor for multiple use, Congress only authorized a reduced corridor of 500 feet in the Sunrise Mountain Instant Study Area for the specific use of a state regulated sponsor of two 500-kilovolt electric transmission lines. (See Clark County Conservation of Public Land and Natural Resources Act of 2002, Pub. L. 107-282; 116 Stat. 1994, Sec. 207(c) (2002). Section 207 (c) of the act is a solitary release of a limited corridor to a specific party to construct a specific project.

The programmatic EIS should specifically address this situation, and hopefully through ultimate approval of the corridor PEIS and subsequent resource management plans, specific congressional action will no longer be necessary. Kern River supports the actions the Bureau of Land Management has taken to date. Similar constraints exist with corridors in the west being bound by wilderness study areas which the corridors intersect. This may exclude the opportunity to expand existing corridors for future growth. The programmatic EIS should address these issues as well.

Thank you for the opportunity to comment on the scope of the West-wide Energy Corridor Programmatic Environmental Impact Statement. Kern River will make itself available should questions arise or further information is needed.

Sincerely



Kris R. Hohenshelt
Manager, Land & Environment