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**To:** [Corridoreisarchives;](#)  
**CC:**  
**Subject:** Energy Corridor Programmatic EIS Comment 80020  
**Date:** Tuesday, November 22, 2005 9:34:00 AM  
**Attachments:** [PEIS\\_cover\\_letter\\_PacifiCorp\\_11.21.05\\_80020.pdf](#)

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Thank you for your comment, Michael Jenkins.

The comment tracking number that has been assigned to your comment is 80020. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 22, 2005 09:33:57AM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80020

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Privacy Preference: Don't withhold name or address from public record

Attachment: S:\Property\_Management\GIS\Geodatabase\MXD\Projects\05-095  
\SubmissiontoAgency\PEIS cover letter PacifiCorp 11.21.05.pdf

Comment Submitted:

Additional attachments including PacifiCorp GIS data and pdf format maps will be emailed to [corridoreiswebmaster@anl.gov](mailto:corridoreiswebmaster@anl.gov)

Questions about submitting comments over the Web? Contact us at:  
[corridoreiswebmaster@anl.gov](mailto:corridoreiswebmaster@anl.gov) or call the Energy Corridor Programmatic EIS

Webmaster at (630)252-6182.

November 21, 2005

Ms. Julia Souder, DOE Project Manager, West-wide Corridor Study  
Office of Electricity Delivery and Energy Reliability  
Room 8H-003  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585

Re: **PacifiCorp** Comments on Issues Relating to the Preparation of a West-wide Energy Corridor Programmatic Environmental Impact Statement

Dear Ms. Souder:

PacifiCorp appreciates the opportunity to provide comments during the scoping process to prepare a West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). We have reviewed the Notice of Intent and information provided on the Department of Energy's (DOE) web site, analyzed the alternatives, attended several open houses and discussed this issue with numerous DOE and Bureau of Land Management (BLM) personnel. We believe that the development and federal designation of energy corridors on federal lands across the western US will provide a more consistent and efficient method for transporting the electricity needed to meet growing demands. PacifiCorp expects the result of this effort will benefit energy developers, transmission providers, consumers, federal agencies who review and approve projects, and the environment. PacifiCorp is very interested in working with the DOE and BLM in identifying the need and location of new corridors and in developing criteria for the designation of energy corridors throughout the west.

PacifiCorp expects that the development of energy corridors and their subsequent incorporation into federal land resource management plans will result in, but not be limited to:

- the establishment of a more efficient, timely and less costly project specific review and approval process,
- development of measures and actions that streamline permitting, i.e. one-stop permitting with one lead agency that communicates early and often with other federal and state agencies,
- the level of review required under the National Environmental Policy Act (NEPA) is limited to an Environmental Assessment or Categorical Exclusion,

- the alternative corridor analysis is eliminated for projects planned within designated corridors,
- existing data use is maximized and shared to eliminate duplicate analyses inside a corridor, and
- guidance and resources are made available at the Agencies Field Office level which promotes consistency regarding the review and approval of projects.

PacifiCorp is a large, regulated western electric utility that serves approximately 1.7 million residential, commercial and industrial electric customers throughout its six state service territory (CA, OR, WA, ID, WY, and UT). Over 55.7 million acres of federal lands are encompassed within this service area including National Parks, National Forests, National Monuments, recreation areas and wilderness study areas. PacifiCorp's transmission and distribution assets and generation and mining facilities are spread across 10 of the 11 western states included in the PEIS. We operate our retail electric service business under the name of Pacific Power and Utah Power, our generating and transmission facilities under the name of PacifiCorp and our mining activities as Energy West Mining Company. Our comments, however, will simply refer to PacifiCorp and not differentiate by affiliate names.

PacifiCorp owns 6,400 gross megawatts of coal-fired generation company-wide in addition to other generating resources including hydroelectric, natural gas, geothermal and wind. PacifiCorp also holds numerous wholesale power contracts that requires the use of our numerous electric high voltage lines (EHV, i.e. transmission lines that operate at voltages above 50KV) to deliver large blocks of energy to users throughout the west. We own approximately 16,000 miles of EHV line, 45,000 miles of overhead distribution line and 13,000 miles of underground distribution cable across the west. The 16,000 miles of EHV line interconnect with other utilities in about 130 locations in the 13 western states and Canadian provinces enabling PacifiCorp to transfer power among more than 60 other western utilities. This makes PacifiCorp a critical resource for supplying and moving power throughout the west.

Portions of the western US and Canada have energy resources that haven't been developed. However there is an ever growing demand for additional electricity and energy and utility companies are diligently looking for generating opportunities and for ways to get the electricity to the load growth areas. For example, the recent Rocky Mountain Area Transmission Study (RMATS) examined the potential development of Powder River coal and open range wind as sources of low cost generation. This generation resource area is located in a remote location well away from users and would require the development of additional transmission networks to get the electricity from the generation site to the market. Numerous other energy developers and regional transmission planning organizations, such as the Western Electricity Coordinating Council (WECC), Northwest Transmission Assessment Committee (NTAC) and Western Utility Group (WUG), have also looked into developing and transmitting electricity across the western US. DOE and BLM (the "Agencies") should work closely with these companies and organizations to establish energy corridors that will meet these future needs.

PacifiCorp is currently working with the BLM and Forest Service to site additional EHV lines throughout the west. The majority of these proposed transmission lines are not in established corridors. All projects, however, are undergoing project specific NEPA analysis. PacifiCorp is requesting that the land under and around these new EHV lines be considered energy corridors and included in the PEIS process. Also, PacifiCorp's existing critical EHV lines shown on Map 1 should be designated as energy corridors in the PEIS. This will allow either for the expansion of facilities within the corridor, or the upgrading of facilities to improve reliability without having to amend existing BLM or Forest Service Land Resource Management Plans.

Map 2 identifies PacifiCorp's proposed energy corridors that may connect area energy resource areas to areas of energy demand. These corridors simply connect two end points; we did not apply engineering design or environmental analysis when developing these options. We are requesting that the Agencies review this information and consider these options for future electric lines as "designated energy corridors" when developing the PEIS.

PacifiCorp recommends that the Agencies interact with each state's Office of Energy Policy, with tribal governments, and other state entities to identify corridors across non-federal lands. The end result should be a seamless and contiguous alignment of state and federal corridors providing for a feasible and useful accommodation for new EHV lines. These groups should focus on regional planning issues so that subsequent project specific approval efforts focus on local issues. These same entities should develop a framework for early communication and coordination that will ensure the energy corridor concept can be developed for non-federal lands.

We would also encourage the Agencies to coordinate this process with the process of establishing National Interest Corridors under Section 1221 of the Energy Policy Act.

PacifiCorp recommends that a process be identified and developed now for designation of future corridors once this PEIS is completed. This effort should identify procedures and criteria for establishment of future energy corridors outside of those designated in the current PEIS. As stated earlier we can not predict where energy development and demand will occur in the future, or where these new corridors will need to be located.

The Agencies must recognize that energy companies will build new lines in existing corridors when practical and possible, however there is a preference that new lines be located with adequate separation from existing lines in order to meet reliability standards and to reduce the risk of losing all lines within a corridor. The Western Electricity Coordinating Council recommends that interconnected transmission lines be located far enough apart in a common corridor to avoid cascading outages and to reduce risk due to fire and other events. Adequate spacing between electric transmission lines is critical.

While PacifiCorp supports the designation of new energy corridors, we do not believe that all new EHV lines can, or should, be limited exclusively to such corridors. There are circumstances where the technical efficiencies, economics and location of energy markets will dictate infrastructure development outside designated corridors. This process should not preclude utilities from proposing and building EHV lines elsewhere on federal lands, so long as any environmental impacts can be properly mitigated.

New energy corridors must be wide enough and flexible enough to accommodate all compatible uses, and allow for its expansion to accommodate future energy needs. These new energy corridors must be dedicated exclusively for the purpose of transmitting energy; no other development should be allowed within those designated boundaries. Agencies should recognize designated corridors as the highest and best use for the property and must provide the appropriate protection necessary to ensure that the property is not utilized for any other purpose other than as the location for an energy transmission resource.

Siting criteria should also be established to ensure diverse energy interests are compatible and that corridors can safely support the diverse needs. Items to consider when developing criteria for corridor designation:

- Degree to which the land has already been developed for energy distribution
- Ability to interconnect or align with corridors on non-federal land
- Compatibility with existing and adjacent land use
- Energy development potential and proximity to markets
- Accessibility for maintenance and repairs
- Vegetation management requirements
- Development of compatible and non-compatible uses within corridors
- Proximity to National Parks, Wilderness Areas, Areas of Critical Environmental Concern, Historic Districts, Wetlands, etc
- Potential for future uses
- State and regional land use plans
- Landscape features to maximize ease of construction (i.e. severe slopes, etc)

Federal land disposal or land swaps of parcels with corridor designations should be made subject to maintaining this designation. Stipulations should be included in the transfer of ownership that protects these corridors.

PacifiCorp appreciates the opportunity to submit these comments. We have long recognized the need to develop business practices, both on public and private lands, which are in harmony with valid and appropriate land use requirements. We look forward to working with the Agencies throughout the scoping process and during the preparation of the draft PEIS.

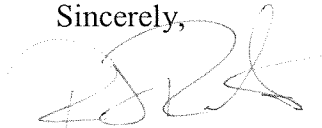
PacifiCorp strongly recommends that the Agencies provide opportunities for electric utilities and energy transmission companies to participate on interdisciplinary teams that collaboratively evaluate and determine energy corridor criteria and location.


If you have any questions on these comments or on the maps, or would like additional information, please feel free to contact:

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801.220.4115

Sincerely,



 Michael G. Jenkins  
Assistant General Counsel

Enclosure A – Map 1: A map showing location of PacifiCorp’s critical existing transmission assets. [.pdf format and GIS shape file format]

Enclosure B – Map 2: A map showing locations of PacifiCorp’s proposed energy corridors necessary to accommodate future load growth. This map also includes PacifiCorp’s critical existing transmission assets. [.pdf format and GIS shape file format]

These maps are ***Business Confidential Information*** made available for your planning efforts only and should not be released to the public.