Department of Energy

Bonneville Power Administration
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CORPORATE

July 10, 2006

In reply refer to: R-3

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

Dear Ms. Souder:

BPA submits the following comments in response to the Preliminary Draft Maps of Potential Energy Corridors on Federal Land that DOE posted for comment for the West-wide Energy Corridor Programmatic EIS. We support the general direction of this effort, but we have some concerns as listed below.

Maps

We appreciate DOE working to develop corridor maps that identify needed corridors through federal lands. However, the current maps are difficult to interpret which makes them less useful for the intended purpose. This is especially true for the state of Washington. We realize that the purpose of the PEIS is to provide environmental coverage for development on federal land and that DOE is only showing where the potential corridors cross federal land. However, without any accompanying verbal description, it is up to the reader to try to interpret the maps. It is difficult to translate the scattered dots into corridors. As we indicated in our prior comments, in order to understand and comment on the corridors that are proposed, they must be described in more detail showing the full linear aspects of the full corridor.

We understand that more detailed maps might be available in the future. Additional review time should also be provided once these maps are available.

Consolidation Process

Through the Section 368 process, DOE requested input on corridors needs. Then, in a separate closed process, those corridor needs were consolidated into the maps that were recently posted. As we indicate below in our specific corridor comments, it is our understanding that some of our corridor requests were either combined with others or not addressed – it is difficult for us to tell without understanding the process. Many of the corridors proposed do not address the reliability aspects that are essential to us. It would be very useful for this process to include, at a minimum,

a written description of how each corridor request was addressed; the rationale for combining corridors, the reasons for excluding corridors, etc.

We recognize that it is difficult to include all the corridors that are requested in this process. Also, it is likely that corridor needs will change over time. The PEIS process should focus on selecting the most significant corridors for study that exist at this time. We suggest that this process be revisited on a periodic basis. Also, this process should be explicit in stating that it is not the intent to force all future projects into these corridors nor should the process be used to block other corridors not designated in this process. The ability of a user to attempt to permit a corridor not identified in this new process should not be affected.

Corridor Reliability

We are concerned that several of the corridor needs we identified in November have not been addressed. It also appears that some of the needs were assumed to be addressed by using existing corridors. We must reiterate our concerns about the reliability aspects of additions to existing corridors and the need for corridor separation. The WECC/NERC Planning Standards require us to analyze the performance of multiple circuit outages in these corridors. If outages of existing circuits cause system problems, the addition of adjacent circuits in the same corridor may not provide any or limited benefit to the system. We continue to believe that our comments regarding corridor reliability must be considered when identifying corridors.

Specific Corridor Comments

We have concerns with four of the proposed corridors on the DOE map. These concerns are based on our interpretation of the maps due to the lack of detail we described above.

1. We had requested a new Monroe-Echo Lake corridor in western Washington that is east of the existing corridor. A couple of dots along the existing corridor and lack of a new route through the Snoqualmie National Forest land indicates to us that you have not included our corridor request. We need this inland route since the land around the lines in the existing corridor is so heavily developed that it will make additions to this corridor difficult, if not impossible. Also, the new corridor we proposed would provide the needed circuit separation that we discussed above and in our earlier submittal.

2. We requested a new Paul-Troutdale corridor in SW Washington. The only corridor sections shown in that vicinity on the DOE map are in NW Oregon. That leads us to believe that the DOE recommended corridor follows the existing Paul-Allston-Keeler transmission corridor that is causing us problems today and nothing along the corridor we requested. Again, the corridor we suggested provides needed separation for reliability purposes. We do not feel the existing corridor is adequate.

3. The Bell-Ashe corridor in Eastern Washington that we requested appears to be terminated at Lower Monumental Dam instead of the Hanford area. We understand that other parties requested a line from Idaho to be terminated at Lower Monumental. However, we see no reason

that the northern line section from Spokane would be required to terminate at the same location. In fact, if we developed the proposed corridor from Spokane into Lower Monumental, we would also require an additional corridor from this location to the Hanford area. Also, we are unsure of the route of this Spokane-Lower Monumental corridor (again we only have a couple of dots on the maps to show this corridor) and we are not sure of the viability of that corridor. We prefer the original corridor we proposed.

4. We had indicated a need for a Cross Cascades corridor in Oregon from the Lapine area to Eugene. The DOE map appears to show two corridors to the north of that area that go east and west of the Warm Springs Reservation. The availability of the connecting corridor through the reservation is questionable but would be essential for a viable cross cascades corridor. Even if this were a contiguous corridor, its electrical performance would not meet our needs.

We appreciate our opportunity to comment on this proposal. However, our ability to comment is impacted by the lack of complete corridor information on the maps. A more complete description of the corridors and additional comment time is needed for an adequate review.

Sincerely,

Marvin J. Landauer
System Planning Team Lead