

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 2:20 PM
To: corridoreisarchives,
Subject: Preliminary Draft Corridor Map Comment M0092

Attachments: National_Grid_Comments_M0092.pdf



National_Grid_Comments_M0092.p...

Thank you for your comment, Joel deJesus.

The comment tracking number that has been assigned to your comment is M0092. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 02:19:56PM CDT

Preliminary Draft Corridor Map Comment: M0092

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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\dejesu\Desktop\National Grid Comments.pdf

Questions about submitting comments over the Web? Contact us at: corridoreiswebmaster@anl.gov or call the Preliminary Draft Corridor Map Webmaster at (630)252-6182.

July 10, 2006

Ms. Julie Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy, 1000 Independence Avenue, S.W.
Washington, DC 20585

RE: National Grid USA Comments on Preliminary Energy Corridor Map

Dear Ms. Souder:

National Grid USA (“National Grid”) appreciates this opportunity to comment on the Department of Energy’s (“DOE”) preliminary energy corridor map released on June 9, 2006, associated with the Programmatic Environmental Impact Statement (“PEIS”) being prepared in accordance with Section 368 of the Energy Policy Act of 2005.

National Grid submitted comments during scoping for the PEIS on November 28, 2005. The comments described in this letter support those submitted during the scoping period and are categorized by topic for reference. When addressing public comments on the preliminary corridors please consider the following:

Preliminary Corridors

All corridors displayed on the map released by the DOE on June 9, 2006 should be carried forward for analysis in the PEIS. These corridors provide general connections to major power infrastructure by paralleling existing linear facilities (i.e., transmission lines, pipelines, transportation corridors). Opportunities for identifying future utility corridors include existing linear facilities and areas with low environmental sensitivity.

Western Electricity Coordinating Council

The Western Electricity Coordinating Council (“WECC”) has identified existing and approved transmission facilities on a map dated January 1, 2006. The facilities displayed on the map are schematic. However, where the actual facilities cross federal lands, these designated rights-of-way should be expanded and designated as utility corridors. The facilities displayed on the map and comments provided during scoping identified existing linear facilities as opportunities for future infrastructure.

Agency and state approved corridors are also identified on the WECC map. Examples of approved corridors that should be included for analysis in the PEIS include; the Southwest Intertie Project corridor from Midpoint Substation (Idaho) to Harry Allen Substation (Nevada); the Devers Palo Verde #2 corridor from the Palo Verde Nuclear Generating Station (Arizona) to Devers Substation (California); the North Gila corridor

from the Palo Verde Nuclear Generating Station (Arizona) to the North Gila Substation (Arizona); and the Navajo Transmission Project corridor from Shiprock Substation (New Mexico) to Marketplace Substation (Nevada). All existing and approved corridors should be included for analysis in the PEIS.

Existing Designated Corridors

Utility corridors previously designated in federal, state, and local planning documents should remain designated corridors. Federal corridors should extend, where applicable, from state and local designated corridors to allow utilities to cross multiple jurisdictions while continuing within a designated corridor. National Grid encourages DOE to include all previously designated corridors for analysis in the PEIS.

Corridors Having Potential Jurisdictional Constraints

There are several areas where potential jurisdictional constraints such as crossing Indian reservations, national monuments, national forests, national recreation areas, etc., are present. These jurisdictional constraints present potential issues and may limit the ability to connect areas of major energy sources (i.e., Wyoming) with major load centers (i.e., Utah, California, Nevada, and Arizona). The PEIS should analyze, at a minimum, corridors where existing utilities cross these lands. Specifically, these include the existing transmission line which crosses the eastern section of the Flaming Gorge National Recreation Area and the transmission line crossing the northern portion of the Uinta/Ouray Indian Reservation in Utah. Additionally, the PEIS should include alternative corridors that would bypass these areas in the event the jurisdictions will not support the designation of utility corridors across their lands. These include an east-west utility corridor which would cross the southern section of the Ashley National Forest in Utah and a north-south utility corridor crossing BLM lands west of the Utah/Colorado state line and east of the Flaming Gorge National Recreation Area.

Future Utility Corridors

A general corridor map was attached to the National Grid scoping comments submitted to DOE on November 28, 2005. A revised map is attached to support comments on the preliminary corridors released by DOE. Corridors provided on November 28, 2005 are displayed in brown and should be reconsidered for analysis in the PEIS. National Grid has completed an opportunities and constraints level analysis and developed preliminary transmission line corridors for the Wyoming-West project. The corridor analysis was based off the criteria summarized in the November 28, 2005 comments. Additional corridors not submitted during scoping in November 2005 are displayed on the attached map in blue and are recommended to be analyzed in the PEIS. National Grid identified those corridors in green on the attached map that was previously submitted during public scoping and were carried forward by DOE. These corridors displayed on the attached map can be obtained in geographical information systems (“GIS”), if necessary, for further analyses by the agencies.

Corridor Widths

Agencies’ (federal, state, and local) corridors vary in width depending on whether they are rights-of-ways, or existing corridors in current management plans. These widths

should be standardized to a minimum of two miles wide, but substantially wider corridors should be considered when necessary due to the unique requirements of certain rights-of-way. For example, within the BLM resource management plans some corridors are only ¼-mile wide, while others are up to 3-miles wide. Corridor widths of two miles will allow the siting of utility lines in existing rights-of-way, while according some flexibility to avoid environmentally sensitive areas, jurisdictional constraints, and meet WECC criteria for separation of lines. Where new corridors are considered, however, substantially broader widths may need to be considered to address constraints, obstacles or impediments to such new corridors.¹ Engineering risk factors evaluated by WECC should be included in the overall analysis of corridor location as well as line separation.

Correspondence

To expand upon any of the issues outlined above please contact Stephen G. Burnage at:

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Please do not hesitate to contact me if you have any questions or concerns.

Respectfully submitted,

Joel deJesus
Attorney for
National Grid USA




¹ Although consideration of corridors under this PEIS pursuant to EPAct 2005 §368 is a fundamentally different consideration from the designation of National Interest Electric Transmission Corridors (“NIETCs”) under section 216(a) of the Federal Power Act, this pragmatic approach to designating corridors for PEIS with minimum widths of two miles with consideration for broader corridors on an as-needed basis (especially for new rights-of-way) is consistent with the view expressed by National Grid in the context of NIETC designation. In “Comments of National Grid USA to the Office of Electricity Delivery and Energy Reliability (“OE”), Regarding the Notice of Inquiry (“NOI”) published on February 2, 2006 on the Considerations for Transmission Congestion Study and Designation of National Interest Electric Transmission Corridors” (dated March 6, 2006), National Grid expressed its support for the DOE’s conclusion that “corridors for potential projects as generalized electricity paths between two (or more) locations, as opposed to specific routes for transmission facilities” and indicated that corridors should be “shown as broad geographic paths to illustrate that a strategic transmission corridor is not necessarily a specific transmission line or right-of-way.”

National Grid USA





Potential Corridors for Future Transmission Lines

LEGEND




Transmission Line Corridors

-  Corridors submitted by National Grid during scoping and identified on the preliminary corridor map released by the Department of Energy
-  Corridors identified by National Grid for evaluation since scoping
-  Corridors previously submitted by National Grid and not identified on the preliminary corridor map released by the Department of Energy that need to be reconsidered

Jurisdiction/Ownership

-  Bureau of Land Management
-  Bureau of Indian Affairs
-  U.S. Forest Service
-  National Park Service
-  Department of Defense
-  U.S. Fish & Wildlife Service
-  State/Private

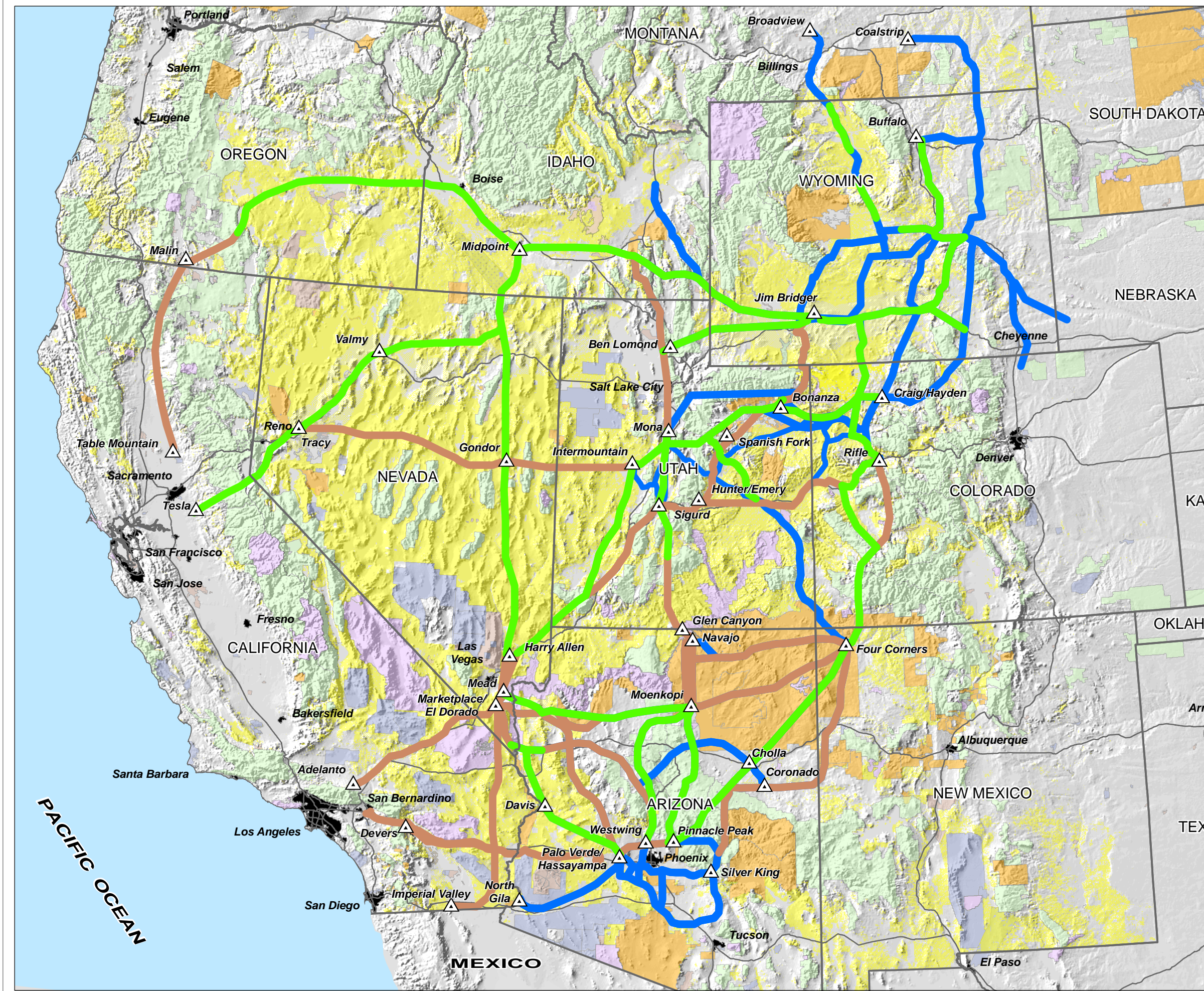
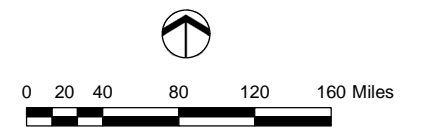
REFERENCE FEATURES

-  State Boundary
-  Major Interstate
-  Major Substation

Data Source Information

Land Ownership and BLM Field Office Boundaries: BLM Denver Service Center, 2004.

NOTE: Transmission corridors and substation locations are schematics and do not necessarily represent precise locations.



July 7, 2006

