

From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80039
Date: Monday, November 28, 2005 12:28:17 PM
Attachments: [Energy_Corridor_Scoping_-_NWE_Comments_80039.doc](#)

Thank you for your comment, Ray Brush, II.

The comment tracking number that has been assigned to your comment is 80039. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 12:28:12PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80039

First Name: Ray

Middle Initial: W

Last Name: Brush, II

Organization: NorthWestern energy

Address: 40 E. Broadway

City: Butte

State: MT

Zip: 59701

Country: USA

Email: ray.brush@northwestern.com

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

Attachment: P:\RWB\PEIS\Energy Corridor Scoping - NWE Comments.doc

Comment Submitted:

Attached are the comments from NorthWestern Energy on the PEIS scoping. There are two maps attached to the letter in pdf format.

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



NorthWestern Corporation
d/b/a NorthWestern Energy
40 E. Broadway
Butte, MT 59701
Telephone: (406) 497-2164
Facsimile: (406) 497-2150
www.northwesternenergy.com

November 28, 2005

Ms. Julia Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-0333
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Corridor Designation Scoping Comments

Dear Ms. Souder,

NorthWestern Energy (NWE) is one of the largest suppliers of electricity and natural gas in the Upper Midwest and Northwest, serving more than 617,000 customers in Montana, South Dakota, and Nebraska. NWE currently owns, operates, and maintains approximately 7000 miles of electric transmission, 50 kV and above, and approximately 2000 miles of natural gas transmission in Montana.

Within Montana, NWE has over 2500 MW of resources in its Generation Interconnection Queue. Most of the firm transmission capacity from our control area to other areas within the Western States is already committed. There is potential for even greater resource development in Montana if there is sufficient transmission to accommodate these additions. Resource additions within Montana will help diversify the electrical resource mix within the Western Electricity Coordinating Council (WECC) area, as well as, increase competition between the resource providers within the State. In order to accommodate this growth in electric resources, existing corridors will need to be expanded or new corridors established. In fact, NWE is in the beginning phases of expanding one such path from Montana to Idaho known as WECC Path 18. Market interest is high with approximately 975 MW of transmission service requests proceeding to the second stage of our Open Season Process. All of the participants have now placed transmission deposits associated with continuation in the facilities study stage.

NWE's natural gas system will require expansion, as well, as the use of natural gas expands in Montana. Plans are to expand the NG transmission system by providing loop service in places where the transmission capacity is lacking. For the most part, this will require the expansion of the existing NG corridors to accommodate a second transmission line.

NWE appreciates the efforts of the Department of Energy, Department of Agriculture, and the Department of Interior to designate energy corridors on federal lands within the eleven Western States. NWE supports the corridor designation because it facilitates the planning process to identify corridors while balancing the environmental and social issues and encourages participation and input from all interested parties. We would also anticipate an expedited environmental permitting process for future projects crossing federal lands. These future projects would include new facilities, upgrades or rebuilding of existing electric transmission and distribution facilities and natural gas pipeline expansion projects within designated corridors. The following comments are offered on the scoping analysis being done for the Programmatic Environmental Impact Statement (PEIS) to evaluate issues associated with designation of energy corridors within the eleven Western States.

Once the initial PEIS is completed, NWE urges the Departments of Agriculture, Commerce, Defense, Energy, and the Interior to develop an ongoing process to modify existing corridors or establish new

corridors. The Energy Policy Act (EPAct) of 2005, Section 368(c) anticipates that this will become an ongoing process that will involve utilities and other interested parties. As time marches on, the corridors established by this process may become outdated due to changes in land use on lands adjoining federal lands and changes to the energy system needs. It is urged that the Departments develop a streamlined permitting process for facilities sited within a designated corridor.

Following should be considered when designating corridors:

- The corridors should contain facilities that are compatible with each other. The types of facilities that are compatible with electric transmission are other electric transmission lines, natural gas pipelines, liquids pipelines, roads, highways, railroads, recreation activities, wildlife, farming, ranching, and telecommunications. The types of facilities that are compatible with natural gas pipelines are other natural gas pipelines, liquids pipelines, electric transmission facilities, roads, highways, railroads, recreation activities, wildlife, farming, ranching, and telecommunications.
- The corridors should be of sufficient width to accommodate multiple facilities while taking into account regional reliability standards. WECC reliability criteria require that the system be able to withstand loss of multiple electric transmission lines that may have common mode failure mechanisms. Some examples are fires within the right-of-way, tower failure involving more than one line, and bus fault within a common substation. Because of these requirements, one should not become dependent on a single corridor. At the Helena scoping meeting, Scott Powers of the BLM indicated that corridors are generally from one-half to ten miles wide. NWE would support a corridor width of several miles. These corridor widths should be also be derived from technical, engineering and vegetation management requirements. On going vegetation management, for example tree clearing, needs to be incorporated into corridor designation.
- There should be flexibility in designating the corridors. The corridors across federal lands need to match up with corridors across adjoining state owned and private lands. This also includes identifying use constraints on adjoining lands such as conservation easements, visual impacts, agricultural restrictions, irrigation requirements and local zoning requirements.
- Consideration should be given to designating multiple corridors even though there may be a limited number of facilities that will actual be developed. This is to cover the issue of being able to get access across adjoining non-federal lands along the proposed route.
- Corridor designation should be coordinated with local and state regulations. In Montana, NWE would expect that the Montana Major Facility Siting Act and other applicable laws would be taken into account. Close coordination with the various land management agencies and the states will be required in areas that have mixed ownership.
- Corridor designation should include existing transmission and distribution corridors on Federal Land that have been formally authorized by law, land use planning process, or other management decisions. This will allow for expansion of existing facilities within the corridor or for the upgrade or rebuilding of an existing facility.
- An expedited permitting procedure for siting facilities within a designated corridor should be developed. The procedures should incorporate the environmental analysis from the PEIS. The NEPA review for future projects, regardless if it is a Categorical Exclusion (CE) or Environmental Assessment (EA) should be tied to the PEIS.

- Federal land swaps or land disposals should only be made with the understanding and restrictions that protect the land as a designated corridor. No increase of land use fees should be allowed under any type of land swaps or land disposals.
- Cumulative impacts should also be addressed in the PEIS and not left to be analyzed and studied for each individual project within a designated corridor.
- We support the wetland and floodplain assessment in the PEIS. We encourage the assessment and evaluation under the Endangered Species Act (ESA). NWE also supports any environmental reviews that may be required to complete the designation of such corridors.
- Projects that are already in development should be given primary consideration for corridor development.

The notice of intent for the PEIS included four alternatives for actions to be taken by the Agencies. The No Action Alternative is not acceptable. It represents a failure to comply with the EPAct 2005. The resulting actions should be a combination of the other alternatives: Increased Utilization, New Corridors, and Optimization Criteria.

NWE proposes the following corridors for electric transmission (see attached map "possible corridors – 2005.pdf"). Most of these corridors were already located on the map used for the regional scoping meetings. Those that were not on the map have been added in brown.

- This first set of proposed corridors is viewed by NWE as most likely candidates for development.
 - From a point near Townsend, MT where the ownership of the Broadview-Garrison 500 kV lines changes south towards Dillon, Mt and then to Idaho Power Company's (IPC) Midpoint Substation.
 - From a point near Townsend, MT where the ownership of the Broadview-Garrison 500 kV lines changes southwest to Whitehall, MT, then south towards Dillon, Mt and then to IPC's Midpoint Substation.
 - From a point near Townsend, MT where the ownership of the Broadview-Garrison 500 kV lines changes southwest to NWE's Mill Creek Substation, south towards Dillon, Mt and then to IPC's Midpoint Substation.
 - From BPA's Garrison Substation, following the existing 230 kV transmission corridor to Mill Creek, then south along the 230 kV transmission corridor to the AMPS Substation in Idaho, and then to IPC's Midpoint Substation.
 - A corridor paralleling the existing 500 kV corridor from Colstrip, MT to BPA's Garrison substation. This corridor is being considered for expansion of existing facilities as well as additional new facilities.
 - From the Great Falls area to BPA's Garrison Substation following the 100 kV Morel line from Great Falls to the Montana Phosphate 100 kV substation and then south to Garrison.
 - From the Great Falls area to BPA's Garrison Substation following the existing 230 kV corridor from Great Falls to Ovando, MT to the Garrison Substation.
 - From Great Falls to Helena paralleling the existing 100 kV corridor to NWE's Spokane Bench Substation and then Southeast to the point near Townsend, MT where the Broadview-Garrison 500 kV line changes ownership.

- From the Great Falls area to Townsend by paralleling the existing 100 kV corridor to Martinsdale, MT, then going south and west towards NWE's Loweth substation and then paralleling the existing 500 kV right to the point near Townsend where the Broadview-Garrison 500 kV line changes ownership.
- The following suggested corridors are either of interest to others or offer access to future resources or markets that are not primary to the resource development in Montana.
 - Colstrip, Mt to Gillette, Wyoming staying east of the Northern Cheyenne Tribal lands.
 - From NWE's Baseline Substation near Billings, Mt to PacifiCorp's Frannie Substation in northern Wyoming staying west of the Crow Tribal lands.
 - Great Falls area north to Lethbridge, Alberta by way of either Shelby, MT or Cut Bank, MT. It is suggested to stay east of the Blackfoot Tribal lands.
 - Great Falls to Glasgow, MT area by going Northeast from Great Falls past Havre, then heading east towards Malta, MT staying north of the Fort Belknap Reservation, and then onto Glasgow.
 - Broadview, MT to Great Falls, MT to Ovando, MT paralleling the existing 230 kV corridor.
- The following electric transmission corridor suggestions are considered to be the most difficult to develop due to the various land uses such as tribal lands, wilderness areas, and urban development.
 - Ovando, Mt to Hot Springs, MT to Spokane, WA paralleling the existing 230 kV corridor.
 - Garrison, MT to Taft, MT to Spokane, WA paralleling the existing 500 kV corridor.

For natural gas pipeline expansion, NWE anticipates providing loop service in areas where its existing pipeline reaches its capacity. The expansion will require enlargement of the existing corridor to allow for the addition NG pipeline. Attached is a map, e13218-1.pdf, showing NWE's existing NG transmission system.

If you have any questions, please contact either Rick Walsh, Manager Environmental Permitting, at (406) 497-3917, Ray Brush, Manager Regional Transmission Policy at (406) 497-4278, or Marc Mallowney, Manager Gas Construction and Maintenance at (406) 497-2285.

Thank you for this opportunity to comment on the PEIS.

Sincerely,

David G. Gates
Vice President, Wholesale Operations

possible
corridors-2005.pdf

e13218-1.pdf