

Summary

QER Panel – Cheyenne 2014

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Tri-State Generation and Transmission Association

Overview:

“Not for profit” association founded in 1952 that generates and delivers electricity to its 44 member “consumer-owned” cooperatives and public power districts. Tri-State serves ~ 1.5 million consumers within an approximately 200,000 square mile service territory located primarily in the more rural areas of Wyoming, Colorado, New Mexico and western Nebraska.

We have an “all of the above generation” portfolio with baseload facilities being primarily coal and natural gas. Our primary mission is to provide a reliable, cost-based supply of electricity while maintaining a sound financial position in accordance with cooperative principles.

Tri-State manages over 5,300 miles of transmission lines extending from various generation sources to our member cooperatives’ electric distribution systems. We cross a variety of federal, state, city, county and private lands to reach our member systems. The nature of our business model requires that we have great familiarity with our service territory to effectively operate. We are staffed internally with experienced professionals to site and permit utility facilities within the complex regulatory framework we must live in. Tri-State and its member cooperatives staffs are imbedded within the communities served.

Over 35% of our service area is federal land so Tri-State has direct experience with siting transmission and vested interest in any efforts designed to streamline the process. We also borrow money from the RUS and therefore trigger NEPA for almost all of our transmission projects.

Siting and Permitting Topic Points:

1. Very appreciative of DOE’s efforts to streamline transmission siting and permitting processes over the last few years. The continued dialogue on this topic is helpful and hopefully educational to those new to this subject area. Written comments were provided by Tri-State in response to DOE’s Rapid Response Team for Transmission (RRTT) and Integrated Interagency Pre-Application Process (IIP) Requests for Information in 2012 and 2013.
 - RRTT Letter Highlights: Coordination needed between federal agencies, use of knowledgeable and unbiased NPMs desirable for projects involving federal lands,

recognition and consistency in land management plans needed, priorities in staffing and funding at the local level necessary.

- IIP Letter Highlights: Pre-application process proposal added time and duplication to existing NEPA approval processes, we believe the direction should focus on improving existing programs and processes.

* NOTE: We are appreciative that the DOE is now revisiting this topic and resubmit copies of the RRTT and IIP letters for this public meeting's record.

2. Federal policies creating more complexity.

- New "exclusion" areas being created by potential T&E species designations, new national monuments, federal conservation easements, tribal issues, etc.
- Focus geared toward interstate transmission, but captures incumbent transmission providers too.

* Helpful if federal agencies more closely coordinated and prioritized goals.

3. Layers of regulatory requirements are not always congruent.

- Federal vs. State vs. Local approvals.

*Consistent processes are needed to improve siting and permitting processes for critical infrastructure like transmission.

4. Regarding the mechanics of the route selection process, siting of transmission must be based upon comprehensive, objective and "real-time" accurate data.

- Vetted scientific data for resource analyses.
- Accurate and up-to-date land use data.
- Public involvement is critical in good decision making.

5. People decide if projects will proceed.

- We see confusion over private transmission proposals vs. incumbent utility load serving projects.
 - Educate public on differences.
 - Land rights acquisition processes may be different due to project intent.

*Accurate and coordinated communication by all involved with transmission could reduce confusion of the public.