

From: [Alison Millsaps](#)
To: [Congestion Study Comments](#)
Subject: Study comment
Date: Sunday, October 19, 2014 11:42:07 PM

I have a few concerns and comments regarding the August 2014 Draft Congestion Study.

First, I find it a little troubling that the Department of Energy not only did not contribute any of its own independently modeled data for this report, but goes so far as to expressly note that it did not validate any of the data. While I understand you used as much publically available data as possible, this study has serious implications for the future of energy policy in this country, and given that this study appears to frequently cite information from industry periodicals, that makes me somewhat nervous. It may be that, as a layperson, I am not familiar enough with this kind of report and am missing some key knowledge in this respect, and I apologize if that's the case, but as a taxpayer and someone whose life could be severely impacted as a result of this study, it's something that concerns me greatly.

I am also somewhat alarmed by this quote from your analysis of the situation in the Midwest:

"Congestion results from high and growing levels of wind generation that cannot be delivered from western sources to more distant loads, and the lack of additional transmission to enable further development in renewable-rich areas." (page 83)

And this quote from page 49:

"Many points of transmission congestion today result from the need to deliver electricity from changing sources of generation. For example, generation sources are changing because of state-mandated RPSs. The best renewable resources (i.e., those with the highest potential capacity factors) tend to be located far from load and sometimes in areas with less transmission than desired for effective resource development. Existing transmission constraints may deter development of these resources.¹⁰¹ While this is not a challenge in all parts of the Eastern Interconnect, it is a principal cause of evolving congestion concerns in the Midwest."

Why? Because in this study and various other places, the Department of Energy has hinted that the perceived bottleneck of wind generation in the Midwest is a congestion concern that might make it necessary to declare a NIETC. Almost as if renewable policy goals in one part of the country would qualify as a "need" sufficient enough to override the regional and state decisions made in other parts of the country (such as the Southeast) and warrant federal intervention and, ultimately, the justification of the use of eminent domain based on the perceived needs of the generator and not the end user. This is a radical idea and one that could easily turn into something quite ugly for any landowner in the path of any proposed project.

Of course, I'm not unbiased being that I live in the path of the proposed Plains & Eastern HVDC transmission line (by the way, you did mean to call it a 3,500MW line and not a 7000MW line on page 56, right? "The Plains & Eastern Line is a 7,000 MW capacity, 800-mile line planned by transmission merchant Clean Line Energy that would originate in western Oklahoma and end in western Tennessee, with a target in-service date of 2017." I would hate to think we'd been given incorrect information about the intended size of the line).

I'll leave the whole Section 1222 thing out of this for now, except to say that I would urge the Department of Energy to be so very cautious about getting into the kind of partnership that could do serious damage to a significant number of landowners on the proposed route, and in turn, to the trust that they have in the federal government to protect them. You have a partnership with them, too... And it's one that's been around a lot longer than a couple years.

I wonder, actually, if the area off the East Coast was a "region", what your analysis there would be. That is where the best wind is located, yes? Would it not make more sense to encourage generation closer to areas with heavy usage and spare the "in-betweens" the cost of shouldering so much transmission? Doesn't distributed generation make more sense in the long term anyway? When you're talking about risk management: weather, threats, etc... Doesn't a diffuse and powerful network make for a stronger grid? Does having an abundance of potential energy in one area mandate that energy be used? Isn't that kind of "Drill, baby, drill!"?

Or, in the middle of this renewable gold rush, is there room for us to recognize that the actions we take from here in an effort to save our planet for the next generation will have costs, but that they should be mitigated as much as possible. That if we are on the verge of upending our entire process, it should be done without collateral damage to the people who've spent their lives working for what they've earned. Rather, it should be done with respect.

Thank you,

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