

From: [Dave Ulery](#)
To: [Congestion Study Comments](#)
Subject: 2014 Congestion Study Comment...
Date: Sunday, October 19, 2014 8:15:09 PM

First, I feel like I should point out an obvious error in your study report. Unless the plan has changed without anyone knowing about it, the Plains and Eastern Clean Line would be 3,500mW, not 7,000mW as was referenced in the report:

"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."

Second, I am within the Southeast region. According to the report, the findings for the Southeast are as follows:

"There are no clear trends in the application of administrative congestion management procedures over the period 2006-2011 with the exception of an increase in level 5 TLR called by ICTE.

There are no reports of persistent transmission constraints within the region.

Transmission is being built in coordination with generation additions following long-standing planning practices overseen by state and regional protocols."

These things being said, I feel like there is absolutely no reason to designate a corridor within Arkansas. It would place an undue burden on landowners and, since there is currently no problem to be solved by a corridor, would be completely unnecessary.

A thing of note within the study: It seems to me that it would be an absolutely dangerous precedent to base "need" and "congestion" on the generation side, particularly the Midwest. To assign "congestion" to wind farms that have not yet been built and may never be built would be an investor's dream and a landowners nightmare. The wind blowing should not dictate whether or not there is a "need" for a corridor. "Need" needs to remain defined as solving a current, end-use congestion problem. As the report states, there is not one in the Southeast.

Thank you,

Dave Ulery
Dover, AR