

**From:** [Keryn Newman](#)  
**To:** [Congestion Study Comments](#)  
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The Department of Energy's 2012 draft "congestion study" once again lacks any hard data upon which to draw logical conclusions, and relies on conjecture and wishful thinking to drive "solutions" to "problems" that don't exist. Sections 1221 and 1222 of the 2005 Energy Policy Act were feeble, toothless attempts to override state authority to site and permit electric transmission that have cost taxpayers and ratepayers significant sums through their as yet unsuccessful implementation. The DOE needs to stop the bloodshed here and let these unworkable sections of the Energy Policy act fade away into the annals of history as just another stupid and costly bit of lobbyist mischief.

The draft congestion study relies heavily on congestion information found on the internet. Even children know that you can find "facts" on the internet to back up any pre-determined conclusion. Without any actual studies or hard data, DOE is simply guessing at the location and effect of congestion. Considering that any transmission projects planned or built as a result of DOE's congestion study will be very costly endeavors, I believe the DOE owes the taxpayers a higher degree of certainty than an internet-sourced "study" that could have been written by any bright middle school student.

DOE's report makes its fatal error by presuming that the best renewables are located far from load centers. And it's all down hill from there. DOE pays little attention to its own maps, which show better wind energy potential located offshore in both the Atlantic and Pacific and the Great Lakes. Coincidentally, these vast untapped resources are located just a few miles from the biggest load centers. Serendipity! DOE also ignores many other non-wind renewable resources located throughout the U.S. DOE's laser focus on onshore wind resources in its "study" has the effect of picking a winner among renewable energy sources that will manipulate energy markets and costs consumers money. The U.S. DOE works for the taxpayers, not the "big wind" industry.

DOE's presumption that it must make any electron generated anywhere in the country available for purchase and use anywhere else is backwards thinking that stagnates local economies and costs consumers money. The most reliable and efficient energy system locates generation as close as possible to load. DOE's meddling in energy delivery not only creates an unreliable energy delivery system, but it interferes in local and regional economies by dictating how and where consumers spend their energy dollars. While locally- or regionally-developed renewables and energy efficiency create local jobs and economic development, DOE's designation of congestion corridors encourages more centralized generation and long-distance transmission that sucks energy dollars out of local communities and creates winners and losers in the economic development of individual states.

DOE should not be playing favorites among states any more than it should be playing favorites over generation sources or energy companies.

Creation of NIETCs to encourage the building of long-distance transmission must also take into account a necessary cost/benefit analysis. Congestion is constantly changing and it is not necessary nor desirable to eliminate it completely. While transmission developers are quick to present transmission benefits, both real and speculative, there is no accurate accounting of the true cost of transmission projects. I'm not talking about a project's total capital spend, or its annual revenue requirement. I'm talking about the very real costs to landowners who are unlucky enough to be picked to sacrifice their homes, businesses, retirement, health, peace of mind and countless other intangible COSTS for the benefit of the electricity-slurping public in some far off city. Market value payments for the involuntary sale of transmission rights of way only attempt to compensate for the value of the land, not all of the other costs to the landowner's way of life and foregone land use possibilities that can't be readily quantified.

Regional planning organizations already plan new transmission needed to alleviate economic congestion. DOE's congestion study serves no useful purpose for consumers and smacks of government collusion with corporate profit-seeking. DOE's congestion study is a wasteful exercise that should not serve as the harbinger of new National Interest Electric Transmission Corridors.

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