

**From:** [Scott Thorsen](#)  
**To:** [Congestion Study Comments](#)  
**Subject:** Transmission Congestion Study Comments  
**Date:** Sunday, October 19, 2014 9:06:10 PM

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I find the Department of Energy's Congestion Report is the most disturbing. While the author explains the definitions used for "congestion" and "constraint" to be narrowly defined, I find these terms to be broad and ambiguous. Right now America has an abundance of wind energy in the Midwest. Decisions to build these wind farms were not made based on market conditions, like basic supply and demand. Many of the late growth in wind generation was based on decisions made with the influence of the Production Tax Credit and the Obama Stimulus Investment Tax Credit.

The price of energy was largely irrelevant as modeling showed wind farms to be profitable from the government subsidy. The market didn't say "build wind farms". The government planners said "build wind farms". Like most government planning, it has shown to be a failure. Now we have a glut in the market with too much wind generation with the wind companies claiming the lack of transmission is a "constraint" for further wind generation. This "constraint" is not from an increase in demand for energy generation but an artificial increase in supply.

Should consumers be forced to pay for transmission they do not need to benefit the generation that was not needed? How far will the Department of Energy go to advocate for wind generation and transmission? We see the DoE advocating for Clean Line Energy's speculation projects, like the Plains & Eastern project with the DoE pushing wind generation from Oklahoma on the TVA. Least cost sources of generation are becoming irrelevant to the Department of Energy.

While this congestion study is from open sources, many of the sources referred to is Transmission Hub. I question the accuracy and relevance of a government study based on the writings of a trade publication. There is no doubt the transmission industry is a biased source. The transmission industry and their trade publications will always advocate for more transmission. This makes a report on transmission congestion basic governmental propaganda with no independent reliability.

While this study makes a note that Distributed Generation is "out of scope" for this study, it is foolish to again advance the transmission industry bias. Trends in solar PV and residential generation are making a huge impact on the transmission industry. For a study on transmission congestion to fail to study these trends in depth is as foolish as a government report on the nation's economy to fail to consider the bubble in the housing market and an increase in foreclosures. The economy looks great and there is no recession if the negatives are ignored. As another example of the Department of Energy's foolishness, the film industry looks

great if the advancements in digital photography are ignored. There are market forces that are just too great to ignore and it is not acceptable for the Department of Energy to recognize these trends but declare them out-of-scope.

Thousands of miles of new transmission is not a solution. The cost is too great. More innovation is needed to find solutions other than rebuild the nation's transmission infrastructure. Further, there is no mechanism in place for consumers and ratepayers to question the need and relevance of transmission projects. FERC has largely become a rubber stamp machine giving consent to any proposed project. While the Department of Energy has an office to promote transmission, there is also no mechanism for Americans to address their concerns. Until the Department of Energy takes a balanced independent position on transmission, reports like this one will be seen as propaganda from a government agency who sees its job as picking winners and losers in a crony socialist system of capitalism. The Department of Energy can do better than this report.

A more relevant report would be on trends in promoting energy efficiency in the transmission industry but the current system with Regional Transmission Organizations is not a mechanism to encourage efficiency in transmission. Again there is no mechanism for the consumer to encourage transmission efficiency versus building more transmission across the nation.

The wind generation industry would have believe there is congestion and constraint preventing wind energy generation in Northwestern Iowa from reaching east coast urban centers. This argument is as foolish as an argument that a canal is needed to allow Nebraska corn to reach the Mississippi River system and exports in New Orleans.

As a society, we have built transmission to advance the coal industry for a national energy independence policy. We've built generation to advance a national nuclear agenda. As a society, shall we build more generation to promote the wind energy?

When does it end?

We build transmission in an attempt to provide parity and arbitrage. As consumers move and demand changes. As generation plants are closed and new generation is sited, it is better for the market place to tell the industry where new generation is needed rather than build more transmission. Parity in Localized Marginal Price (LMP) through cannot be achieved through a never ending build of more transmission.

It would appear the issues between MISO and PJM are become protectionism as PJM is limiting inflows from MISO and keep the price of energy high in the eastern PJM

region. Again, I would question if there can ever be enough transmission to relieve a "congestion" that is artificially created. With the Department of Energy and FERC unable to understand the size and capacity of the grid, how can we know when more transmission is truly needed?

Perhaps the Department of Energy's time would better be spent documenting the actual size and capacity of the American Transmission Grid rather than rely on the industry to define the congestions and constraints. My fear is once this study is published, it will be referred to as gospel and a source of justification for more transmission. It is my hope the Secretary of Energy reject this study and ask for a better job from the authors of the study.

Thank you.

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