Plainsandeastern

From: Luis Contreras <doccontreras@gmail.com>
Sent: Monday, June 08, 2015 4:37 PM
To: Plainsandeastern
Subject: P&E Clean Line Part 2 - 1222 comment
Attachments: The P&E Clean Line solves the wrong problem - June 8 2015.pdf

June 8, 2015

Re: P&E Clean Line Part 2 Section 1222

Dear Secretary Moniz,

The P&E Clean Line project is a *poor* solution for the *wrong* problem.

DOE should not participate in this project.

Respectfully,

Dr. Luis Contreras
Eureka Springs, AR 72631

The Problem: Distribution utilities are trying to reduce carbon dioxide pollution, *the cause of Global Climate Change*, to meet EPA Clean Power Plan (CPP) regulations, and provide reliable electric power at an affordable price. CPP requires a reduction of carbon dioxide emissions from electric power generated within every state.

P&E Clean Line pretends to solve this urgent problem with false promises of "low-cost, clean energy."

The Devil is in the details:

- P&E is not low-cost, clean energy.
- Wind power would not be available in time to deal with the climate emergency. With strong landowner opposition, the Arkansas Public Service Commission Order denying P&E status as Arkansas utility, and the last minute changes to the Part 2 DOE Application, wind energy from the P&E Clean Line after 2020 would be irrelevant. We need to act now!

There are superior proven solutions available today: Energy conservation, energy efficiency, demand response and distributed solar generation using rooftop and community solar, are quick, low-cost, affordable and effective solutions. Examples provided in the References herein.

DOE should stay far away from Clean Line

CLEP, like a wolf in sheep's clothing, is using the green flag to try to get DOE participation. Why would DOE choose to participate?

- Clean Line land agents invite landowners to host the P&E line with threats and promises: an offer you can't refuse. Not surprisingly, the terms of the P&E Clean Line **Easement Agreement** are not disclosed in the revised "part 2" Application.
- Clean Line makes false promises to create thousands of jobs, bring millions of money and increase county tax revenues:
  - Transmission lines are built by out-of-state expert crews using helicopters and heavy equipment.
  - Local, permanent jobs are not created.
  - Clearing a 200-foot wide easement, building temporary roads, using main roads for heavy equipment, is a months-long nuisance for traversed communities. And that is only the beginning. Once Clean Line has an interstate 200-foot wide easement, other utilities will come behind with other projects.
  - If the local benefits Clean Line claims were true, why not build two lines? Why would landowners and public officials loudly oppose hosting this line?
  - Clean Line, like the XL Pipeline, uses flawed logic and incomplete accounting. Destroying property values does not create wealth.
  - No one wants to live near a high voltage transmission line. Public health hazards and widely held concerns lower land values. Scientific studies show ultra violet (UV) light, invisible to humans, keep wildlife away from transmission lines splitting their habitat.
- Clean Line construction "simulation video" uses an unrealistic scenario of a line running parallel to a wide road to suggest minimal disturbance to landowners. Experience with real lines shows

property values drop 40 percent of the entire traversed parcel and adjacent properties within line-of-sight of the line.

- Clean Line has tried to create the illusion their projects are "a done deal" using paid media and hired lobbyists.
  - When *conditional approval* was granted for the Rock Island project requiring 100 percent funding and voluntary agreements with all traversed landowners, the Chicago Tribune, November 25, 2014 story headline was "Clean Line's wind-power superhighway approved in Illinois."
  - When the TimesFreePress.com wrote a highly misleading story on January 15, 2015 "TRA approves Clean Line Energy to bring wind power to TVA" KnoxNews.com carried the same story, adding "Arkansas Regulators have been *skeptical of the merits of a high-voltage line* running across the state, but Clean Line could operate with DOE approval to operate as a utility in the public interest."

TRA is the Tennessee Regulatory Authority, a state agency unrelated to TVA. *TVA made it clear stating in the news: there is no power purchase agreement between P&E and TVA.*

The Arkansas Public Service Commission (APSC) had denied the P&E application to become an Arkansas utility and build transmission lines in AR. APSC was not *"skeptical of the merits of a high-voltage line."* APSC issued an Order **denying** the P&E application in docket APSC 10-041-U.

There is no demand for the P&E HVDC line, only potential supply

- P&E does not have Power Purchase Agreements with utilities. The 3,500-MW of wind power is the rated capacity of the line used to justify a $2 Billion project. The additional 500-MW for Arkansas, mentioned as a sideline with no details on the Revised P&E Application, was added as an option to get APSC approval. There is no proof 400-MW will solve grid reliability issues nor increased AR demand. Arkansas exports over 30 percent of the energy generated in the state; additional 400-MW are not needed in Arkansas.
- TVA located at the end of the line has made it clear: wind energy from P&E is not in the 2015 Integrated Resource Plan. The TVA Board chooses **least-cost** power. Case in point: The Memphis TVA, natural gas 1,000-MW Allen power plant, was approved in 2014; it is currently under construction at a cost of $960 Million. The Sierra Club campaign "turn don't burn" endorsing Clean Line was ineffective. TVA board knows the high-cost and low-value of remote bulk wind energy.
- Matching customer demand with power supply is all about timing. Wind power generation peaks during the night at a time customer demand is low. During the day, when customer demand is high, wind turbines are idle.
- Wind power is not "just in time." Electrons need to be used as soon as they are generated. Extra supply creates serious signal frequency problems for grid controllers to keep the grid in balance.
- The *hidden costs* of remote, bulk, intermittent, wind energy are ignored by P&E Clean Line. Remote bulk wind power is low-value.

P&E is a solution for an imaginary problem: "How to transport wind power from Oklahoma to far away eastern states." *The problem P&E tries to solve does not exist.* There are no idle wind farms waiting for P&E sometime after 2020.

Who needs the P&E line and why?

- Clean Line speculative investors want to take a 200-foot wide 750-mile long strip of private property, with participation of DOE and its Southwestern Power Administration to use federal eminent domain. The plan is to build the line with no money down, using $2 Billion of "other people's money."
- Clean Line is a needed by greedy wind farm investors, abusing federal incentives, accelerated depreciation, and other tax benefits, to make a windfall generating wind power. Idle wind turbines do not make a profit.
- Clean Line is a needed only by industrial wind turbine manufacturers, and suppliers of expensive HVDC transmission infrastructure.

References

Distributed Generation trumps remote bulk power generation
The leading German electric utility E.ON is partnering in 2015 with Sungevity, the California based solar company, to provide customer local solutions and community solar.

Transmission is the problem, not the solution. Moving away to Distributed Generation. *Consumers want clean, sustainable energy that they can use efficiently and in a way that conserves resources.*

Germany's Biggest Utility, E.ON, Is Divesting Fully From Centralized Power Plants. The utility is spinning off its conventional power business to focus on "agility, innovation, and digitalization."
December 1, 2014
In his presentation to investors Teyssen described how the "new energy world" is forcing E.ON to change:

Until not too long ago, the structure of the energy business was relatively straightforward and linear. The value chain extended from the drill hole, gas field, and power station to transmission lines, the wholesale market, and end customers. The entire business was understood and managed from the perspective of big production facilities. This is the conventional energy world familiar to all of us. It consists of big assets, integrated systems, bulk trading, and large sales volume. Its technologies are mature and proven.

This world still exists and will remain indispensable. In the last few years, however, a new world has grown up alongside it; a world characterized above all by technological innovation and individualized customer expectations. The increasing technological maturity and cost-efficiency and thus the growth of renewables

constitute a key driver of this trend. More money is invested in renewables than in any other generation technology. Far from diminishing, this trend will actually increase.

Renewables aren't just revolutionizing power generation. Together with other technological innovations, they're changing the role of customers, who can already use solar panels to produce a portion of their energy. As energy storage devices become more prevalent, customers will be able to make themselves largely independent of the conventional power and gas supply network.

The proportion of customers that want to play a more active role in designing their energy supply is growing steadily. Above all, they want clean, sustainable energy that they can use efficiently and in a way that conserves resources.

http://www.greentechmedia.com/articles/read/Germanys-Biggest-Utility-Is-Divesting-From-Centralized-Power

Arkansas Chooses Solar Power

Entergy Arkansas To Add State's Largest Solar Power Plant To Grid By End Of Decade

April 2015

The state largest electric utility said that Arkansas County's Grand Prairie will soon become home to an 81-megawatt photovoltaic solar energy generating facility, an emissions-free renewable energy facility to be connected to Entergy Arkansas' transmission grid no later than mid-2019. "For Entergy Arkansas, meeting the needs of our customers now and in years to come means embracing new technologies in our industry that make sense for our customers and for the communities we serve," said Hugh McDonald, president and CEO of Entergy Arkansas.

http://talkbusiness.net/2015/04/entergy-arkansas-to-add-states-largest-solar-power-plant-to-grid-by-end-of-decade/

Carroll Electric Cooperative Corp. promotes Solar Energy

May 2015

The power of solar energy is fascinating. How can something transform sunlight into electricity?

As you can see from each region of the map, the distance, angle, and duration of the sunlight all affect solar energy production. Given the sunlight available in the areas served by the Cooperative, one could reasonably expect many hours of solar production.

Utility Scale: Conventional power plants in Arkansas typically range from 500 to 1,800 megawatts. A 12-megawatt solar array is planned for construction in Arkansas in 2015. This will by far, be the largest installation in the mid-south region of the United States. This

installation will utilize 100 acres of land near Camden, Ark., and will primarily serve one industrial consumer.

Community Solar: A number of for-profit and not-for-profit enterprises (some who are utilities and some who are not) are embarking upon projects that divide a cluster of panels among interested individuals. There are a wide variety of economic structures to fund the panels' up-front costs and/or generate profits. Often, subscriptions to a pro-rata share of the panels are sold to individuals. Without regard to any profit motive, the success in generating individual subscriptions is fundamentally connected to a utility's electric rates.

Arkansas Advanced Energy Association news: Arkansas Electric Cooperative, Ouachita Electric Cooperative, and Aerojet Rocketdyne have entered into an agreement with Silicon Ranch Corp. in a 12-megawatt solar field in East Camden, Arkansas. February 6, 2015 http://www.mitchellwilliamslaw.com/energy-arkansas-electric-cooperative-corporationouachita-electric-cooperativeaerojet-rocketdyne-announces-south-arkansas-solar-project

TVA Chooses Solar Power

TVA moves to buy 80MW of large-scale solar

Recharge News, February 17 2015

TVA will take the full output from an 80MW Solar PV plant NextEra plans to build in Alabama, saying it is competitive with any other energy options on the table.

http://www.rechargenews.com/solar/1391789/tva-moves-to-buy-80mw-of-large-scale-solar-from-nextera

TVA chooses not to purchase power from P&E Clean Line

TVA Integrated Resource Plan 2015 does not include power from P&E Clean Line

http://www.tva.com/environment/reports/irp/

P&E is not in the 2015 TVA Integrated Resource Plan

POWER Magazine, March 2015

http://www.powermag.com/public-power-big-dog-tva-takes-fresh-approach-to-resource-planning/

TVA 2015 Draft IRP does not include P&E Clean Line

March 2015

http://blog.cleanenergy.org/2015/03/24/tva-2015-draft-irp-views-clean-energy-through-a-blurred-lens/

Deceptive stories on TVA and P&E

TRA approves Clean Line Energy to bring wind power to TVA

A Houston company that plans to build a $2 billion transmission line from Oklahoma to Tennessee has gained approval from state regulators to extend the line into Memphis. Clean Line Energy Partners LLC said Tuesday the approval by Tennessee Regulatory Authority moves the company one step closer toward erecting a 700-mile line to bring wind energy from the plains of Texas and Oklahoma to the hills of the Tennessee Valley.

Times Free Press, January 15, 2015

http://www.timesfreepress.com/news/business/aroundregion/story/2015/jan/15/trapproves-cleline-energy-bring-wind-power-tv/282774/

TRA approves Clean Line Energy to bring wind power to TVA

News Sentinel Story, Jan 15, 2015

http://www.knoxnews.com/business/tra-approves-clean-line-energy-to-bring-wind-power-to-tva