

Plainsandean

From: Luis Contreras <doccontreras@gmail.com>
Sent: Monday, June 01, 2015 5:07 PM
To: Plainsandean
Subject: Non-NEPA Comment on P&E: P&E Clean Line does NOT meet Section 1222 criteria for the project: Necessary to accommodate an actual or projected increase in demand for electric transmission capacity.
Attachments: Wind remote bulk power is not clean.pdf

Dear Secretary Moniz,

P&E Clean Line does NOT meet Section 1222 criteria for the project:
Necessary to accommodate an actual or projected increase in demand for
electric transmission capacity.

Wind remote bulk power is not clean, and imported power does not help meet
EPA CPP pollution standards. Please deny the P&E application

Respectfully,

Dr. Luis Contreras

Eureka Springs, AR

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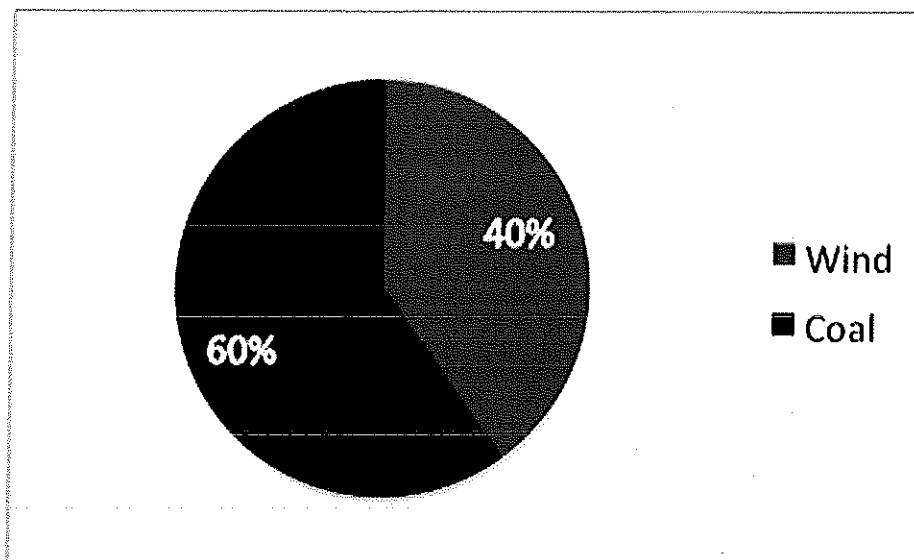
Fiction:

The revised application claims *an increased wind power demand* of over 3,500 MW of transmission capacity. In other words, utilities would immediately sign PPA's as soon as the P&E line is in service.

Facts:

1. EPA Clean Power Plan (CPP) is about reducing carbon dioxide emissions from coal-powered plant generation within each state. Clean power generated in Oklahoma does not help meet EPA CPP standards for Arkansas, or any other Eastern states.

2. Wind remote bulk power is not clean. This may seem as a contradiction, but in fact, the energy delivered by P&E would be at most 40 percent clean:



Wind turbines generate energy only when the wind is blowing, within a narrow speed range. Their output is intermittent, volatile, unpredictable, and unreliable. At most, 40% of the power would be generated by wind. The rest of the time, SPP coal electrons would be

on the line. The pie chart is a long-term average, say for one year. On a daily basis, you would see about 10 hours of variable output power generation, with peak generation in the middle of the night when power has low value. This is one of the reasons TVA does not want P&E power: the total true cost of wind power is unaffordable.

Additionally, the grid must have reliable generating capacity immediately available to "back up" the intermittent, volatile and unreliable output from wind turbines to keep the grid in balance. Natural gas power plants are frequently used to compensate for the hours wind turbines are idle. Bulk transmission makes this gap, say 1,000 MW difficult to compensate. Backup units need to be ready to go online within 10 minutes or less. This double punch of intermittency and volatility makes the true cost of wind power unaffordable.

How many coal-fired plants would be taken out of service were P&E available today? ZERO. TVA in 2014 proved this point with the Allen coal plant, deciding to build a 1,000 MW gas plant at the same site.

P&E ignores the true nature of wind power and the EPA CPP rules.

This is what P&E says in the application, section 2.1:

The increased demand for transmission capacity on the Project proposed by Clean Line is unquestionable.

- *Clean Line recently conducted an open solicitation for transmission service requests over the Project. Clean Line received 29 requests from 15 different transmission customers. Together, these customers requested 17,091 MW of transmission service, or 392% of the Project's total 4,355 MW of West-East transfer capacity. The increased demand for interregional capacity to connect wind-rich zones with load-centers exists today.*

In addition to the strong results from the Project's capacity solicitation, there is a broad record of support demonstrating that the Project is necessary to accommodate increased demand for interregional transmission capacity. As discussed in further detail below:

- Wind energy companies have an increasing need for new transmission capacity to support development of new wind farms. These companies are active in the Oklahoma Panhandle region, and they demand transmission capacity because of the strong business case to ship wind energy to the Mid-South and Southeast and because of the limitations of the existing grid. Clean Line conducted a Request for Information ("RFI") to which 29 projects responded. As discussed in the Draft EIS for the Project, there is over 8,000 MW of wind potential in suitable areas of wind development within 40 miles of the proposed western converter location. (Section 2.1.2)
- Load-serving entities have expressed specific interest in, and demand for, additional electric transmission capacity from the Project to provide access to low-cost, clean power to their customers. TVA recently sent a Letter of Interest to Clean Line, and the East Texas Electric Cooperatives entered into a Letter of Intent to participate in the Project.³ These load serving entities, and others, recognize the potential for low-cost wind energy to provide substantial benefit to their customers. (Section 2.1.3)
- There are recognized limitations to the existing transmission system's ability to support wind energy development and interregional deliveries of such low-cost wind energy to the Mid-South and Southeast. Existing transmission lines and transmission planning processes cannot accommodate the demonstrated demand for interregional transmission capacity between the Oklahoma Panhandle region and the Mid-South and Southeast. (Section 2.1.4)

All of these factors reinforce and confirm that the Project is necessary to accommodate the increasing demand for interregional transmission capacity to facilitate the further development and delivery of low-cost wind energy.

The P&E claims are not compelling. Open solicitation details are not provided; even if the data was accurate, open solicitation proves nothing. The newly announced Tesla PowerWall batteries sold out until 2016, with no money down. Tesla's \$800 million in new business is not in the bank, no one knows how many will sell and when they will be available. Same as P&E wind power promised for 2018 or later.

The only demand is driven by the supply. Even here the P&E empty claims are pure speculation.

How many wind turbines today are idle, waiting for the P&E 2018+ line? ZERO.

If DOE decides not to participate, new wind farms would stay in the drawing board. Remote bulk wind power is high-cost and low-value. Not even TVA wants it!

This is not a chicken and egg question. Wind power is a rotten egg. Bulk remote wind generation would never exist without the tax and accelerated depreciation incentives.

Lack of transmission is not holding back a low-carbon clean power resource.

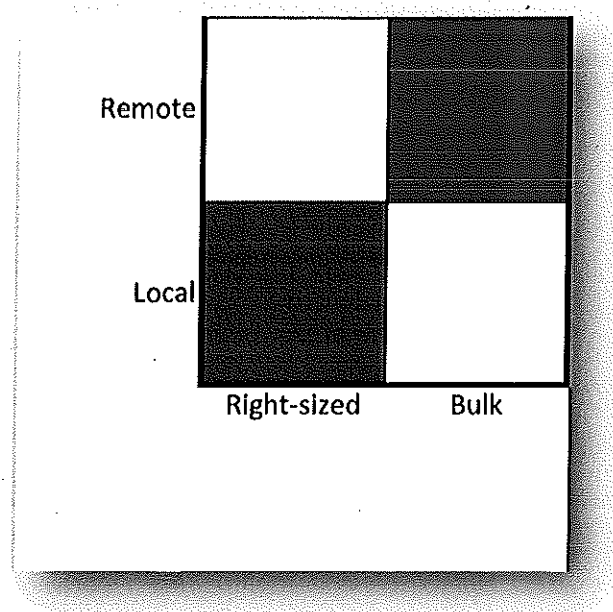
Carbon footprint is the total greenhouse gas emissions caused by a project. Clean Line intentionally ignores the carbon footprint of the land used for wind farms, converter stations, and transmission

easements, plus the manufacture, installation, maintenance and repairs of industrial turbines and the transmission infrastructure.

How can this generation and transmission monster be clean energy?

"Renewable energy" is vague, incomplete, misleading concept that simply means no fossil fuels are required for power generation.

"Sustainable energy" is a much better term: good for the environment, good for the people, profitable without subsidies. Clean Line is not sustainable. If you are thinking solar, you are in the right track!



World wide, the new energy paradigm is customer driven: Local, right-sized low-cost, high-value solutions!

Reference

TVA Board says NO to Clean Line

May 18, 2015

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