

Cynthia Callahan
Pope County
London, AR 72847
June 2, 2015

Dept of Energy Section 1222
Clean Line Energy Partners (CLEP)—Plains and Eastern Clean Line Application.

Dear Secretary Moniz,

In order to exercise the authority to engage in these activities under section 1222, the Secretary, in consultation with the applicable Power Marketing Administrator, must first determine that a proposed Project satisfies certain statutory criteria:

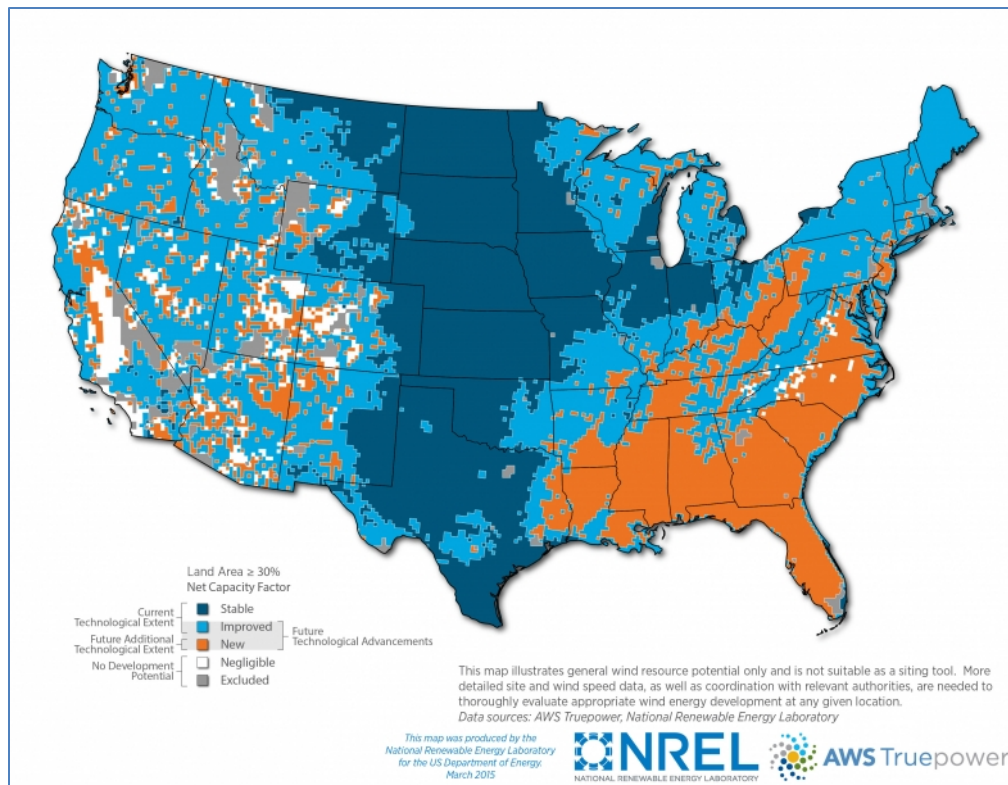
i. The proposed Project must be either:

*(A) Located in an area designated under section 216(a) of the Federal Power Act (16 U.S.C. 824p(a)) and will reduce congestion of electric transmission in interstate commerce; **NOPE***

(B) Necessary to accommodate an actual or projected increase in demand for electric transmission capacity;

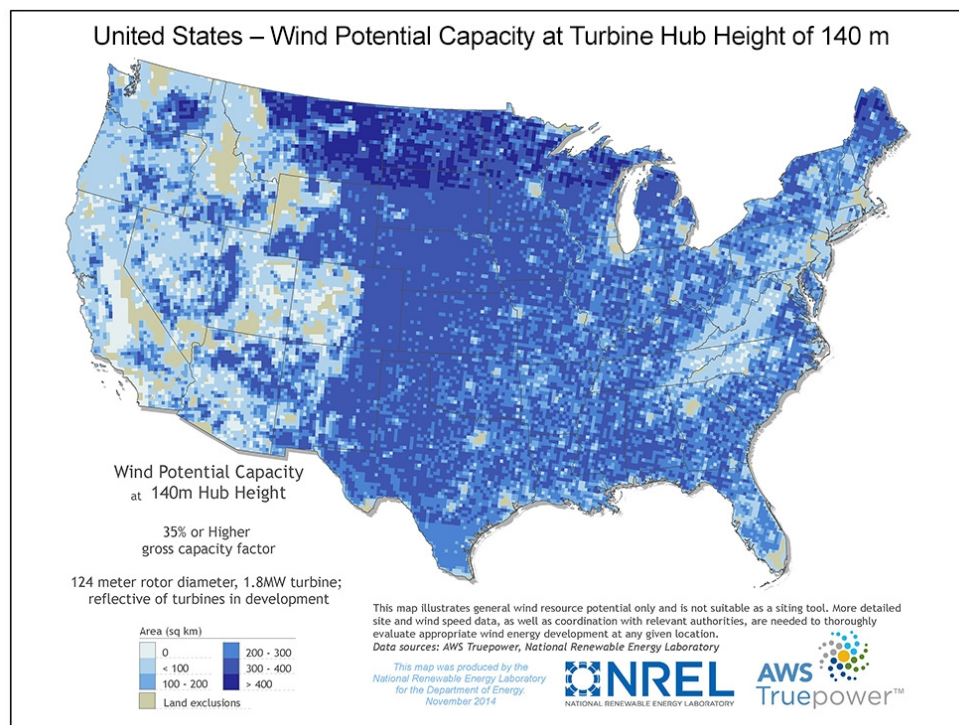
Sec. Moniz, I heard you tell the Congressmen at the Quadrennial Energy Review, via YouTube, that Energy Demand has 'FLATLINED'. This project is NOT NECESSARY.

Clean Line says the project is needed because the South Eastern U.S. doesn't have access to wind power but according to <http://energy.gov/eere/articles/unlocking-our-nation-s-wind-potential> That is NOT TRUE.



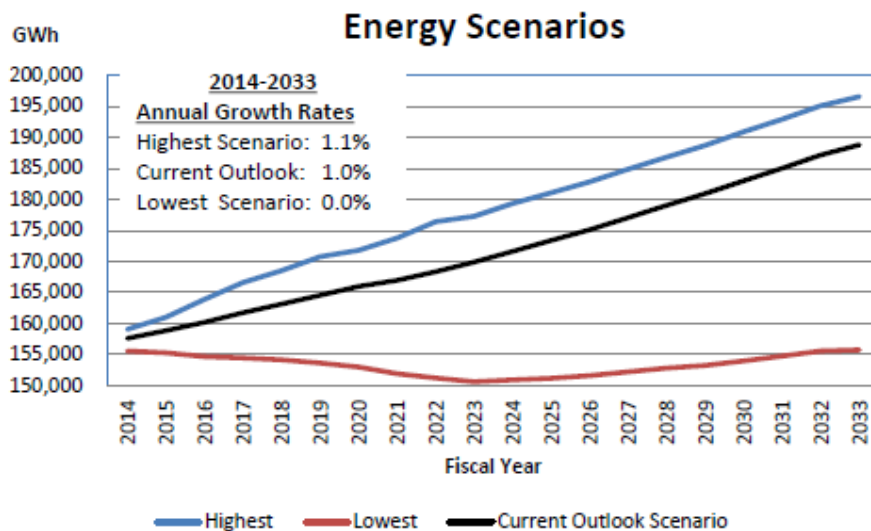
This map was in an Energy.gov article on MAY 19, 2015! Clean Line's data from 2009 is obsolete, undated and untrue.

Even this one from 2014 does not validate Clean Line's claim that the SE can't develop its own wind.



The Law says there it must be necessary to accommodate actual or projected need but according to the DRAFT TVA IRP 2015 the Current Outlook 1.0 % increase – low Scenario 0.0% - Reality is likely less than 1.0%. This demonstrates NO NEED for this project. TVA has evaluated the CLEP project and has not made it a priority; it appears in the riskiest scenario and won't be considered as a possibility until 2030. This project is NOT NECESSARY according to the TVA.

<http://www.tva.gov/environment/reports/irp/pdf/TVA-Draft-Integrated-Resource-Plan.pdf>



About wind;

We also have long-term power purchase contracts with eight wind farms located in Illinois, Kansas and Iowa. These facilities provide about 1,500 MW of nameplate capacity. TVA anticipates about 14% of the nameplate to be available for peak summer requirements. TVA obtains the renewable energy credits from seven of these farms. Renewable energy credits are a separate commodity formed from the production of energy at designated sites.

Renewables: Renewable additions range from ~900 MW to ~12,600 MW of nameplate capacity. The lowest selection of renewable assets occurs in the distributed marketplace scenario. The highest selection of renewables occurs in the economic growth scenario. This includes utility and commercial scale renewables and does not include small distributed renewable assets. The assumptions on distributed renewables were considered in the load demand projections for each scenario (see further discussion in Appendix C).

- There are no immediate needs for baseload resources beyond the completion of Watts Bar Unit 2 and the Browns Ferry extended power uprates.
- Most of the variation in expansion plans is around natural gas and renewables and most of the resource plans show a tradeoff between EE and gas resources.
- Higher levels of energy efficiency and renewable resources are indicated in many cases over the 20 year study period.
- Changing environmental standards for CO2 will drive retire/control decisions on some coal-fired generation in the mid-2020s
- Solar resources begin appearing in the resource plans in the mid 2020s; wind resources appear in the late 2020s in some scenarios, and generally the HVDC wind option is not selected until early 2030s

And generally the HVDC wind option is not selected until early 2030's, if at all!!!!

This option Strategy E carries the most COST and RISK!

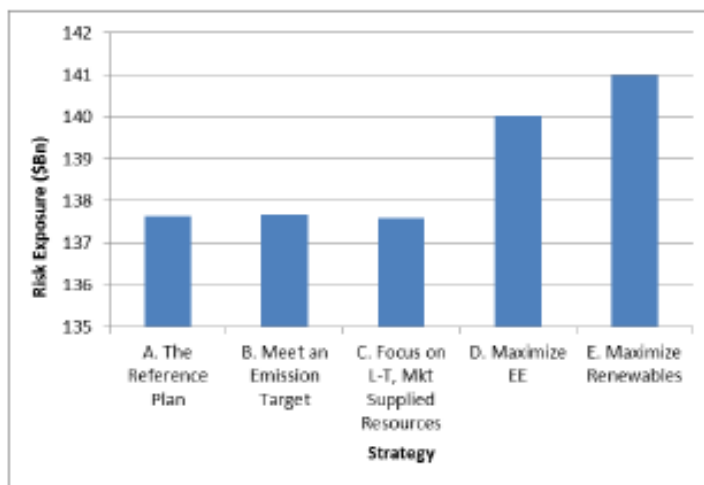


Figure 8-4: Risk Exposure

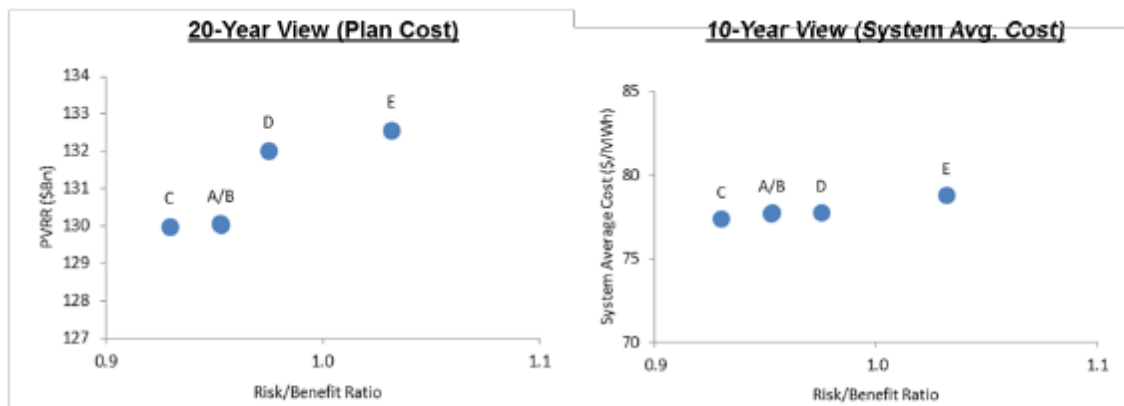


Figure 8-5: Cost/Risk Trade-Offs

Based on these charts, there does not appear to be a trade-off between cost and risk; that is, as cost increases risk also increases. These charts also reinforce the cost and risk assessment results discussed about Strategies D and E having somewhat higher plan costs and exhibit higher financial risks, with Strategy E showing the highest cost and risk outcome.

Technologies and Parameters Reviewed

Power generation and energy storage resources considered in the review included the following, which represent alternatives for new capacity to serve future load:

- Wind energy generation
 - Onshore within the Tennessee Valley
 - Located in Midcontinent Integrated System Operator (MISO) or Southwest Power Pool (SPP)
 - Obtained via High Voltage Direct Current (HVDC) transmission

For wind energy, 16 of the 29 parameter values compared (or 55%) were consistent, with about half of the remaining values showing differences greater than 20%. Recommended outage rates were materially higher than TVA values for all three technology alternatives. Other differences varied by technology, and some potentially offsetting effects are seen.

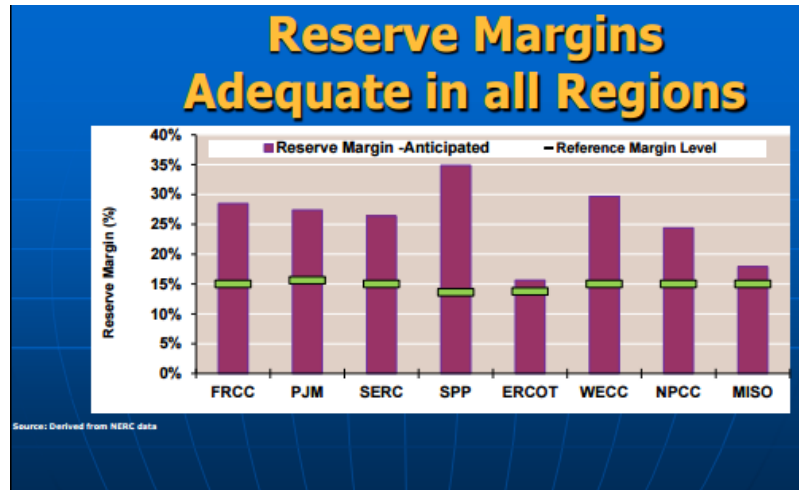
ACCORDING to NERC there is NO NEED.

<http://ferc.gov/market-oversight/reports-analyses/mkt-views/2015/05-14-15.pdf>

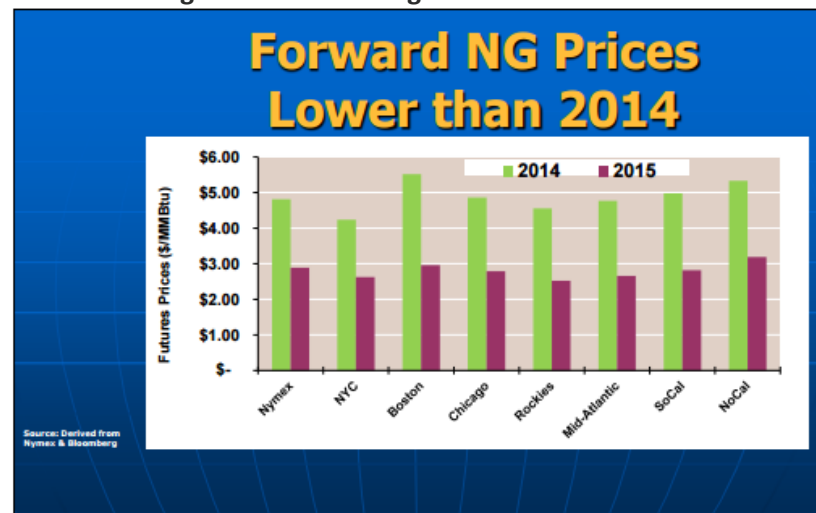
2015 NERC Report:

- Market conditions going into the summer will reflect the continued low natural gas prices that have resulted from robust production, as well as the recovery of fuel stockpiles at coal-fired power plants.
- Regional electric system reserve margins are adequate, despite modest growth in load, which is primarily attributable to increased industrial activity.
- Meanwhile, the total generating capacity in the U.S. has decreased by about 3 percent, primarily because of increased coal generator retirements. This is a continuation of the trend that was seen last year. In contrast to coal, NERC forecasts an increase of approximately 3.5 GW in wind

generation capacity over last year, or approximately 6 percent and brings the national wind total to approximately 65 GW. NERC is also projecting a net increase of approximately 2 GW of installed utility-scale solar capacity for this summer, though more solar generation is planned to come online this summer.



- SPP has the highest Reserve Margin!



- **Gas is going to be even CHEAPER.** With summer futures prices below \$3.00/MMBtu in most regions, natural gas is expected to be competitive with coal on a \$/MMBtu basis, when adjusted for the relative efficiency of natural gas versus coal-fired electric generation units. The only region where summer futures are above \$3.00/MMBtu is Northern California; however, since the region has no coal-fired plants, it will not experience any coal-to-gas switching. Any further downward price pressure would give natural gas an even greater advantage in the supply stack and is comparable to 2012, when the Henry Hub price dropped to the lowest level in over ten years, averaging \$2.65/MMBtu. According to industry estimates, this resulted in 5.1 Bcfd coal-to-gas fuel switching. Estimates for this summer indicate that a \$2.50/MMBtu natural gas price could result in 4-5 Bcfd of incremental natural gas demand from power generators.

- **NOT A SINGLE MENTION OF ANY NEEDS OR PROBLEMS IN THE SOUTHEASTERN U.S. This project is NOT NECESSARY.**

STOP RIGHT HERE – CLEP DOES NOT QUALIFY

*ii. The proposed Project must be consistent **with both**:*

(A) Transmission needs identified, in a transmission expansion plan or otherwise, by the appropriate Transmission Organization (as defined in the Federal Power Act, 16 U.S.C. 791a et seq.) if any, or approved regional reliability organization; and

SPP in their 2015 ITP10 Scope included CLEP Plains and Eastern:

“Two new DC interconnections, the Tres Amigas DC Tie and the Clean Line Plains & Eastern project, will be included in the models for sensitivity analysis **only**.”

SPP is NOT incorporating Clean Line Plains & Eastern project into their PLAN.

(B) Efficient and reliable operation of the transmission grid;

iii. The proposed Project will be operated in conformance with prudent utility practice;

HVDC through Tornado prone states is not prudent. If you believe climate change is causing more severe weather, this is an even bigger issue. HVDC interconnection with the TVA creates problems integration on their grid. TVA is already utilizing Wind without this project.

STOP RIGHT HERE – CLEP DOES NOT QUALIFY

iv. The proposed Project will be operated by, or in conformance with the rules of, the appropriate Transmission Organization, if any; or if such an organization does not exist, regional reliability organization; and

v. The proposed Project will not duplicate the functions of existing transmission facilities or proposed facilities which are the subject of ongoing or approved siting and related permitting proceedings.

Clean Line fails this very important stipulation in Sec. 1222. Needed transmission is already being undertaken by our regional authorities in AC line where it can truly be a part of the ‘grid’ unlike this 720 mile one way extension cord of HVDC. Clean Line is unnecessary duplication intended to stimulate construction of generation purposed only to export power between regions. It also fails to present any evidence that there are buyers for this power in other regions.

It's just not true that new generation cannot be built without Clean Line providing a way to get it to "market," considering there is no identified market. Clean Line is in a chicken/egg scenario, supposing if it builds its project that generation and customers will develop, however, Clean Line cannot build without generators and customers developing FIRST.

Section 1222 is not purposed to "permit" transmission lines when a state has denied a permit.

d) Relationship to other laws

Nothing in this section affects any requirement of--

(1) any Federal environmental law, including the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.);

(2) any Federal or State law relating to the siting of energy facilities; or

(3) any existing authorizing statutes.

It simply allows DOE to "participate" in designing, developing, constructing, operating, maintaining or owning transmission. The Arkansas Public Service Commission said, "NO, because Clean Line is NOT a Utility and does not serve AR." Oh, then, the 'AR converter station' suggestion comes on the scene.

STOP RIGHT HERE – CLEP DOES NOT QUALIFY

This has never been used before, so WHERE are the RULES for applying Section 1222? NO decision should be made until there are RULES in place!

Where are

But there is more . . .

If a proposed Project meets the eligibility requirements, **which it does NOT**, DOE and the relevant PMA will conduct an initial evaluation of the eligible Project Proposals, considering criteria including, but not limited to, the following: **WHAT other criteria might appear?**

1. Whether the Project is in the public interest;

First of all – Why do the people, the public, have to prove this is NOT in the public interest? Where is the PROOF that this project is in the public interest? Why doesn't Clean Line or DOE have to prove it? Just saying it is so, does not make it so!

In 2010 when CLEP applied under Sec. 1222 for TWO HVDC lines carrying 7000MW of power they said, *"While the United States has the best renewable resources in the industrialized world, the transmission infrastructure does not yet exist to connect the bulk of these resources, predominantly located in remote areas, to distant load often located near urban centers. New long-haul transmission lines must be built to fully capture the potential of America's vast renewable resources and further the development of a clean energy economy."* But this is 2015 and this simply isn't true. The urban centers of the Southeastern US do not need the wind power from the Great Plains. The SE is now capable of developing their own wind power according to the DOE. The TVA has studied this and has not agreed to an interconnection.

The wind generation potential in the plains can get on the grid, via the RTO's who can and are upgrading their grid in prudent fashion. CLEP IS NOT NEEDED.

This is NOT in the public interest! There isn't even a legitimate NEED for transmitting via HVDC from OK to TN. There is NO evidence of need and plenty of evidence to the contrary.

A PRIVATE merchant transmission line built for wind farms that do not yet exist to take SOME wind generated power to the TVA and or SWPA that do NOT NEED or want it does not serve the public.

This project serves the venture capitalist seeking to make money via the Federal Government using Eminent Domain. HVDC from OK to TN does not complement, enhance or upgrade the grid but is superfluous. It trespasses on TWO states.

There are so many GOOD ways to utilize wind power but this one is the WORST ideas possible. If they want to build their private project that is independent of any RTO, let them build it if they can without DOE participation, without Federal Eminent Domain!

2. Whether the Project will facilitate the reliable delivery of power generated by renewable resources;

Reliable? NO, 720 miles, 120-1200 ft towers through tornado, thunderstorm, and straight line wind prone country. HVDC – one storm, one tower down and the WHOLE line is OFF LINE.

Reliable? NO, Wind has to be ‘gas firmed’ according to Clean Line – base load can never be carried by Wind. AND

According to the TVA: <http://www.tn.gov/tra/orders/2014/1400036p.pdf> (also attached)

Reliability is an issue:

*“TVA analyzes historic and forecasted wind patterns to determine expected wind deliveries at our system peak. Our forecasting and planning processes reflect adjustment to wind generation at our summer peaks based on this analysis. Clean Line has told us that a production profile provided by the independent meteorology firm, 3Tier Oklahoma, shows that panhandle wind energy produces at about a 50 percent capacity factor between the hours of 4:00 p.m. and 7:00 p.m., thus contributing to meeting peak demand. TVA's current wind resources produced about **25 percent average capacity factor** over that peak period last summer, with significant variation each day (between 5 and 65 percent capacity factor). TVA will take the seasonal and time-of-day energy patterns of wind into account when evaluating adding additional wind energy to its portfolio. **Because wind is an intermittent resource that lacks some of the dispatch capability of other resources, it does not eliminate the need for base load or dispatch-able power plants like nuclear, natural gas, coal and hydropower.** Adding intermittent generation resources like wind can be challenging to manage, particularly as the volume of generation from those sources increases. Wind patterns are fairly predictable, but not entirely so; in addition, weather and other factors can affect output. **To maintain reliability, a wind energy purchaser must keep adequate capacity and spinning reserves to cover the variability inherent to wind. Spinning reserve is typically calculated as the amount of capacity available to cover the loss of the largest generation source on the system.***

*Utilities across the country have been integrating more wind into their systems over the last several years, and **TVA already integrates 1,515 megawatts of off-system wind power.** The industry has growing experience with this issue, **but it does make ensuring reliability more complex.***

If the projection for TVA's electricity demand has changed since September 2013, does it make more sense to purchase this wind power from Clean Line Energy Partners, to build additional nuclear capacity, or to build additional natural gas or coal capacity? While demand over the next decade or so is predicted to be stable with low growth, the TVA generation fleet is in transition. TVA has retired or will retire a substantial portion of its coal fleet; we are committed to the completion of Watts Bar Nuclear Plant Unit 2 and to a large new gas combined cycle plant in Paradise, Kentucky. We have the potential to get incremental megawatts from the hydro system

and a significant amount from power uprates in the nuclear fleet. We have to either retrofit, retire, or replace the Allen Plant in Memphis before 2019 under the terms of an agreement with EPA and others. **(Clean Line cannot supplant Allen because of the need for a generation source physically located in that area to provide transmission support that imported wind generation cannot provide.)** In addition, **other market participants have approached TVA with expressions of interest to provide electricity from gas, nuclear, wind and solar assets.** TVA also factors in energy efficiency and demand response programs into its resource decisions. The recently announced draft 111 (d) rule from EPA, if enacted in its current form, will also have a national impact on future decisions.”

TVA is replacing the ALLEN Fossil Fuel plant with Natural GAS, NOT Wind.

TVA doesn't want this:

Officials call Clean Line project 'questionable' <http://www.covingtonleader.com/officials-call-clean-line-project-questionable-cms-2715>

Jeff Ireland, jireland@covingtonleader.com

Thursday, February 12, 2015 8:12 am

For the second time in a year and a half, the Tipton County Commission made it official: The legislative body does not want the Plains and Eastern Clean Line coming through Tipton County. The commissioners unanimously passed a resolution Monday night that read, in part, "The necessity of this massive project is questionable given TVA's release statement that it has already reached EPA's target system-wide and expects to exceed it." A similar resolution was passed in July of 2013 and area towns have passed resolutions against the power line project. Plains and Eastern Clean Line is planning a 700-mile electric transmission project that would deliver wind energy from the Oklahoma Panhandle region to utilities and customers in Tennessee, Arkansas and other markets in the Southeast. Clean Line Energy Partners LLC, a Houston-based company, is investing \$2 billion in the project. **County Executive Jeff Huffman, who drafted the resolution, said Arkansas has rejected the project, but the company is trying to get utility status through the federal government. If that happens, Huffman said, Clean Line could, through eminent domain, take land even if land owners do not want to sell. Huffman said the project is "fueled by groups of billionaire investors who are trying to condemn property for a money-making venture."** The company has proposed installing 200-foot lattice-type towers through South Tipton County. "It's rolling down hill," Huffman said. "I don't think it's fair to the people of Tipton County ... I don't think it (the resolution) will stop them. If somebody decides to try and stop it, this is something they can use."

3. The benefits and impacts of the Project in each state it traverses, including economic and environmental factors;

There are NO REAL benefits but rather a NET NEGATIVE for the states it traverses; there are HUGE economic and environmental damages that are unacceptable. In AR, SWN pays millions in property taxes and has brought jobs and revenue to the local communities in which they work. Hurting SWN is hurting AR, economically.

“Southwestern Energy Company (SWN) detailed the significant and negative ways Plains and Eastern could “impact local, regional, and state economies” as proposed. Including:

- that the proposed route would result in a significant reduction in development benefits which “could manifest in increased unemployment, reduced royalty payments, and declines in tax revenue. In Arkansas, SWN has contributed “nearly \$2.5 billion in royalty payments, payroll, taxes, and charitable contributions since 2007”.
- that the line could affect the 25 existing well pads (with an average profit of \$6 million each) located partially or wholly within the 200’ ROW on the proposed and alternate routes for Plains and Eastern. Or the additional 91 existing well pads located within 700’ of the ROW for the proposed and alternate routes.
- that the line, as routed, would cause a permanent cessation of activity on the 46 wells it crosses over directly.
- that the proposed route crosses gathering lines 87 times for a total of 2 miles of affected gathering line.
- that “stray current from the Plains and Eastern project has the potential to adversely affect pipelines and casings by accelerating corrosion even under normal operating conditions”.
- that they were not provided early or direct notice of the line. “This raises the question of how many natural gas operators, pipelines, and other parties with subsurface interests in the vicinity of the Project” have not been adequately or timely notified, or remain unaware of the Project’s existence.”
- that potential interference with electrical equipment could have serious effects: “failure of this system could result in an over-pressure condition that could lead to an explosion of fire” or “an overflow condition that causes the discharge of such water [salt water produced from the well] into adjacent areas including any environmentally sensitive areas nearby.”

Stray Voltage is a real issue: (See Attached File) MO DOT HVDC.pdf

“Effects of Ground Voltage or Stray Current on Infrastructure Caused by High Voltage Direct Current (HVDC) Transmission Lines”

Prepared by Renée McHenry, Transportation Librarian

Prepared for Jim Smith, Design Liaison Engineer

May 29, 2014

“Background: The requester asked for background information concerning the effects of ground voltage produced by a high voltage direct current transmission line and its potential effects on steel or iron products which are part of a state DOT’s infrastructure. The requester was contacted by a property owner who is concerned about the proposed Grain Belt Express High Voltage Transmission line.”

JOBS? SWN has brought jobs and revenue to the state. Clean Line will NOT. According to the dEIS AR can expect about 108 temporary construction jobs and about 15-30 permanent full time jobs and that is

only if the converter station is built in Pope Co.; which, by the way, Pope County does not want. Clean Line promises HUNDREDS of jobs but it is not true. General Cable CEO has said numerous times, and I have heard him with my own ears in person, that a contract with CL will give them 2 years of work, NO NEW JOBS, just 2 years of work. Wind is turning out to be a job killer in many states.

TAXES? Clean Line tells the press every chance they get that millions of dollars will come to landowners, counties, schools through taxes yet in their application they want SWPA to OWN the line in AR – this would make it EXEMPT from taxes. So, they would not be paying any taxes in AR. If any taxes are ever paid it won't be by Clean Line and it won't be what they promise. Oh, but they want to own the 'transmission' on the line.

Tourism dollars spent in AR has increased 6 fold since 1978. This project trespasses across tourist areas and will have a HUGE NEGATIVE impact on AR Tourism. The EIS did NOT adequately address the losses CLEP wants AR to accept for their private financial gain. The regions the project wants to trespass generated **1.7 Billion dollars of income** for Arkansas in 2014. (See attached File.) Arkansas is working hard to develop and build tourism and this project would have a devastating effect on these efforts. The Mississippi Flyway is a huge source of tourism dollars from duck hunters. This project will have negative and yet unknown effects on the ducks migration too. This negative economic impact is unacceptable to AR.

Property Value loss due to proximity to a HVDC line of this magnitude is an unacceptable cost that should not be placed on the backs of the citizens of OK and AR. Wind farm development or cumulative effects will also bring property value loss and loss of quality of life. Research is new but available on the problems with human beings living near high voltage lines and wind turbines. These disruptions of daily human life are unacceptable. I addressed this in previous comments.

The Poor – are disproportionately affected – millions of dollars of property value will be lost by people with a median income of \$32,697. All so that some urban centers can feel good about paying for wind energy, that isn't all wind that they didn't have to sacrifice to generate.

Loss of Quality of LIFE The sight and Sound – Corona Noise around a HVDC line disruptions daily life as well as dropping property value. People who live in the country do so because it is QUIET and there is a VIEW, take those away and you have taken much of the property's value to the owner and the prospective buyer. And, I know 2 people whose homes are near the proposed route that have been told by their doctors that they cannot live near these lines due to the new pacemakers they have. The EIS says in the same section, that in some cases this could be fatal but there are no significant adverse effects on health from this project. Fatal is not acceptable. Or in your opinion, **how many fatalities are OK?**

How many bird and bat deaths are OK? See attached file from the American Bird Conservatory.

Stray Current has not been adequately research. It will affect the land use in and around the ROW.

Soil Erosion can't be fixed once it has occurred, this and clear cutting 8000 acres in AR is not green or clean.

The AR converter station and the MO converter station on the Grain Belt Express were NOT part of Clean Line's original plan. They had no intention of delivering power to AR or MO. AR and MO do not need or want their power and do not want to sacrifice in the name of clean energy for a 'market' Clean wants to tap in the eastern U.S. because they have a 'strong desire for clean energy' so the dEIS says. This is SO UNNECESSARY. Since AR is already and energy EXPORTER, and is developing its own wind power in the state, AR doesn't need a 'little' power off this line. The Proposed site for this unneeded and unwanted converter station is in a wetland! Really? Clean Line seems to do all planning from a desk in Houston via google maps.

4. The technical viability of the Project, considering engineering, electrical, and geographic factors;

Their proposed route goes through canyons, rivers, crosses schools, homes, because NO SURVEY has ever been conducted ON THE GROUND. Even a topographical map would have been good but they obviously didn't use one since there are crazy changes in elevation on the route that are so unnecessary.

The 10 year average is 58 tornadoes a year and some years have over 100. Someone needs to check with NOAA about this, like I did!

Corona Noise is a problem outside the ROW, too. You see, sound travels in all directions and is reflected off the hills around here. Even the frequencies that are below human hearing affect a human being.

5. The financial viability of the Project.

Clean Line's business plan is not "**competitive**," it **relies on a government-granted right to condemn and take property**. If Clean Line's compensation package was so great, landowners would be falling all over themselves to sign on.

CLEP claims they are assuming all market risk for its project and that should also include the financial risk of **voluntary land acquisition not the use Federal Eminent Domain**. Looking at their other projects they can expect at least 80%-90% condemnation in AR. They claim they will assume market risk but they also have told state regulators that they may "have to" apply to regional planning authorities for cost allocation of its projects in the future. In fact, CLEP has been busy behind the scenes in the past, trying to drum up support for cost allocation of its projects. CLEP seems to think that if they "build it, they will come". SWPP doesn't want or need this new transmission line and doesn't want it forced upon them. Further examination of CLEP's business model notes that the rates it may charge customers include all project costs, **plus profit**. Speaking of customers, there are NONE. NO, not ONE Contract!

According to Daniel Poneman, Letter from DOE to Michael Skelly, April 12, 2005

RE: Advance Funding Agreement

- Clean Line will have a sufficient percentage of its line subscribed to support the Project's financial viability;

So far, they have NONE. They claim they had responses to Open Solicitation representing lots of MW of power but have failed to file a report to FERC demonstrating the results of the Open Solicitation. They have nothing but 'responses'. Those responses could have been, "NO, Thanks!"

FERC

<http://www.ferc.gov/CalendarFiles/20140814161029-ER14-2070-000.pdf>

<http://www.stoppathwv.com/documents/P&ECL-NegotiatedRateAuthority.pdf>

1. Applicants also state that, to ensure transparency, the specific rules of the open season, detailed bidding guidelines, evaluation criteria, estimated rates, and proposed form agreements will be posted on its internet website and forwarded to interested parties. Applicants also commit that they will also provide public notice of the open

season in appropriate trade publications. **Additionally, Applicants state that the results of the open season auction will be posted on an internet website.¹**

(B) Plains and Eastern are hereby directed to make a compliance filing disclosing the results of the capacity allocation process within 30 days after the close of the open solicitation process, as discussed in the body of this order.

Where is the report?

Clean Line claims, *"The Project was included as one of the projects considered in SPP's "ITP 20," which is the RTO's 20-year Integrated Transmission Plan that was published in July 2013."*

But it is NOT mentioned at all in this document!

http://www.spp.org/publications/ITP20_Report_01-26-11.pdf

There is record of an interconnection study; that is all.

<http://www.spp.org/publications/TWG%2011.7%20&%208.12%20Minutes%20&%20Attachments.pdf>

Other Issues:

According to the Advance Funding Agreement Clean is responsible for decommissioning but what will prevent CLEP and any of their LLC's from declaring Bankruptcy or what if they do not even exist in the future?

- vii. To the extent Southwestern takes ownership of Project assets, Clean Line will agree to pay for the removal of such assets at the end of the Project's useful life;
- viii. Clean Line will hold DOE and Southwestern harmless against any liabilities DOE and Southwestern may incur as the owner of Project assets, and will assume responsibility for achieving and maintaining compliance with the NERC reliability standards, including staffing, and any liabilities resulting from noncompliance with such standards; and
- ix. Clean Line will provide such security as is necessary and appropriate to ensure its financial responsibility for its undertakings under this Agreement and subsequent agreements between the Parties relating to the Project.

Where is the evidence of the fulfillment of the Advanced Funding Agreement?

Clean Line's 2010 application is already 'out of date'. Things have changed in the last 5 years that make their justifications for this project null and void. SPP doesn't need this. TVA doesn't need this.

The people in the southeast U.S. don't need this. And the people in OK and AR sure don't need this! There is NO PUBLIC INTEREST to be served with this project.

Clean Line is working on two other projects across the Great Plains. Are they counting all the 'not yet developed but will be developed if they build the line' wind farm capacity for all 3 lines in hope that one will get permitted? The Plains and Eastern, according to Michael Skelly will need wind generations covering an area the size of Rhode Island. What about Grain Belt, what about Rock Island? We cannot carpet all the Great Plains with wind turbines!!!!

Clean Line in every press release, website and public speech says 4000MW of CHEAP, CLEAN WIND power will . . . Just NOT TRUE! This line can't ever carry 4000MW of wind, it will carry any and all kinds of power, according to FERC; you can't discriminate wind vs coal, gas, nuclear, hydro. The WIND cannot carry the base load! (*Line capacity has changed over the years, 7000 MW then 3500 MW then 4000 MW.*)

Clean Line says they will reduce the use of Coal. No, THEY, won't. TVA doesn't see it that way.

The dEIS rubber stamped every concern, with, "no adverse effects" or called them 'insignificant'; because, the people and the animals and the environment in the **path of profit** are insignificant?

Clean Line is facing the same strong opposition in every state. Today, the Missouri Public Service Commission has denied them a Certification of Public Necessity as Arkansas did.

Strong OPPOSITION in 7 states!

Why are all the landowners in agreement? Why can't they be happy to believe they will get lots of money, their schools will get lots of taxes, and their state will get lots of jobs? Why can't they be happy knowing they will be saving the planet by reducing coal, saving water and securing our energy future with renewables while there will be no adverse effects on their property, their livelihoods, their health, or the environment? Why can't they be happy believing this project improves the electric grid increasing reliability and security?

BECAUSE IT IS NOT TRUE! If all of the above was TRUE – there would NOT be nearly 100% opposition in the landowners. This is NOT about NIMBY. The only people supporting it are MIMPSY – Money in my pocket, S----- You, these people do NOT live near the proposed route but think they may stand to make a buck. I have met some of these people!

Let me describe the opposition: Well educated, tax-paying, hard-working, productive members of society (who do NOT live off the government), who support RENEWABLE energy, Energy Efficiency and would be some of the first to utilize renewables such as Solar and Wind if LOCAL generation and distributed were available. Most of us already have solar electric fence chargers, for example, because we buy solar as it hits the market. We have done real research and are well informed about this project and are more knowledgeable than many of the people directly involved in this project that has already disrupted our lives for over a year and threatens our future and we will never give up the fight. We have attended and spoken at hearings, we have spoken at state legislature hearings, we have spoken at local debates, we have written letters, letters, letters, petitions, phone calls, Fairs, social media updates. We spend far more time on this than it deserves to the detriment of our personal lives but this is what is at stake, our personal lives; our way of life. We are LANDOWNERS, we have invested our wealth in the future, by investing in land not a banking investment firm that makes money off of other people's money; it is our legacy and our children's inheritance. How dare CL use the DOE to try to take our property to make themselves a buck for a project that has NO MERIT?

What we suspected has come true: http://www.stltoday.com/business/local/missouri-regulators-may-block-wind-transmission-project/article_58b169db-7671-50a1-8fd0-5af07f245472.html

*Missouri regulators appear poised to scuttle a transmission line that backers say would transmit thousands of megawatts of wind power from the Kansas plains to homes and businesses farther east. The so-called "Grain Belt Express" transmission line is one of several proposed by independent transmission developer Clean Line Energy, of Houston. It has already won regulatory approval in Kansas and Indiana for the project, and it is still waiting on Missouri and Illinois. Only two Missouri Public Service Commissioners signaled support for Grain Belt. The other three signaled they would oppose the line in a formal vote at one of the PSC's next meetings. The line would cross 724 tracts of land in the state, and if the PSC grants it public utility status, it could use eminent domain to acquire easements it can't buy. Hundreds of rural landowners have taken to social media, committee meetings in the Legislature and PSC hearings to voice their opposition to the project. "We're thrilled," said Jennifer Gatrell, who heads the group Block Grain Belt Express. "We think this is a great win for representative democracy, grass-roots activism and landowner rights." Grain Belt has been in the works for years in response to the growing demand for wind power. Of the 4,000 megawatts of power the line could carry, the company says up to 500 megawatts could be offloaded to the grid in Missouri. **Some commissioners expressed concern Tuesday that it would be a more expensive form of energy. Commissioner Bill Kenney, who said he plans to vote against construction, cast doubts on the economic impact it would have in the state. "I do not see the benefit to Missourians," Kenney said.** The issue is bigger than Missouri or the Grain Belt project in particular, said Mark Lawlor, Clean Line's director of development. The country is trying to figure out how to reduce carbon pollution linked to climate change under new federal regulations, which **many say** will require a large buildout of transmission infrastructure.*

WHO ARE THE MANY? CLEAN LINE AND THEIR INVESTORS?

"How do we get stuff built?" Lawlor said. "If the 'no' was because people didn't like it, landowners didn't like it, then how are we going to build transmission? It kind of goes beyond this one project."

SEE PARAGRAPH ABOVE ABOUT WHY THERE IS OPPOSITION IN 7 STATES.

If the PSC does reject the project, Lawlor said Clean Line won't give up. It could pursue federal eminent domain authority through the Energy Department, an approach it is pursuing in Arkansas after the state declined to approve another of its routes. "These

projects are too valuable and too much in demand (to walk away from)," Lawlor said. "We remain confident in their value and we'll look at everything we can."

Too valuable to who? Clean Line and their investors, not the citizens of the U.S.

At the same meeting, the PSC approved a 7-mile transmission project between Palmyra and the Mississippi River proposed by Ameren Transmission, the final leg of its 380-mile Illinois Rivers project across that state. It is scheduled to be complete in 2018. Last week, Ameren Transmission asked for PSC approval for a 100-mile transmission project across northeast Missouri, scheduled to be complete by 2019. The company hopes for a decision by January.

"Wind power is one of our main reasons for those power lines as well," said Peggy Ladd, Ameren Transmission's director of stakeholder relations.

The Mo Public Service Commission approved 2 transmission projects in MO to accommodate WIND because they are PART OF THE GRID AND LOCAL at the same meeting Clean Line was denied!

Wind is getting on the grid without Clean Line! For Clean Line THIS IS NOT ABOUT WIND, it's about profiteering from Government subsidies and using Federal Eminent Domain for pure profit.

If they had come to AR and worked with Entergy to upgrade the grid to bring on more renewables they would be building transmission lines now instead of 'developing' these projects for years.

Finally, most of the public still doesn't know about this let alone about this PUBLIC COMMENT period. There needs to an extension of the public comment period and PUBLIC HEARINGS on a project that claims to be in the PUBLIC interest.

Sincerely,

Cynthia Callahan