

June 3, 2015

By Overnight Mail and E-mail

The Honorable Patricia A. Hoffman,
Assistant Secretary
Ms. Angela Colamaria,
Senior Program Manager
Office of Electricity Deliverability
and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20505

**RE: Request for Extension of Deadline to Submit Comments on the Application
of Proposed Project for Clean Line Plains and Eastern Transmission Line,
OE Docket No. TPF-01**

Dear Assistant Secretary Hoffman and Ms. Colamaria:

On April 28, 2015, the Office of Electricity Deliverability and Energy Reliability of the U.S. Department of Energy (DOE) published a notice in the Federal Register soliciting public comments on the application submitted to DOE by Clean Line Energy Partners LLC (Clean Line) for the Plains and Eastern high-voltage direct current (HVDC) electric transmission project (Plains and Eastern Project or the Project).¹ The notice states that comments “must be submitted on or before June 12, 2015.” Among other matters, DOE requests public comment on whether the Project meets the criteria set forth in Section 1222 of the Energy Policy Act of 2005 (42 U.S.C. § 16421) such that DOE may “design, develop, construct, operate, maintain, or own, or participate with other entities in designing, developing, constructing, operating, maintaining, or owning”² the electric transmission facilities proposed by Clean Line.

SWN Production (Arkansas), LLC (SWN-A) and DeSoto Gathering Company, LLC (DGC and, together with their publicly traded parent Southwestern Energy Company and its other subsidiaries, “SWN”)³ hereby request that the deadline for public comments be extended **no less than 45 days, or no earlier than Monday, July 27, 2015**. SWN submits that good cause exists for its extension request for several reasons, as follows:

¹ DOE, Application for Proposed Project for Clean Line Plains and Eastern Transmission Project, 80 Fed. Reg. 23,520 (Apr. 28, 2015).

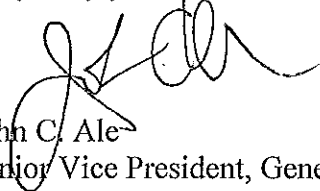
² 42 U.S.C. § 16421(b).

³ SWN-A is a natural gas exploration and production company and DGC is a natural gas gathering company. Both are subsidiaries of Southwestern Energy Company and together submitted comments to DOE on the Project’s Draft Environmental Impact Statement on April 20, 2015.

- Section 1222 of the Energy Policy Act of 2005 has never been interpreted before, and its application to the Plains and Eastern Project raises a number of complex and novel issues which SWN requires more time to analyze and address in comments. These issues include, but are not limited to, the scope and extent of DOE's participation and whether the Project meets the statutory and regulatory criteria⁴ for participation by DOE.
- The "Part II" application prepared by Clean Line in response to DOE's December 2014 request for additional information contains significant material changes to the Project proposal, including a proposal for the Southwestern Power Administration to own all of the transmission facilities in Arkansas.⁵
- Given the number of public comments submitted on the Draft Environmental Impact Statement raising the issue of whether affected parties have been adequately notified about the project, providing an additional 45 days to submit comments on the Project is reasonable and will not cause any undue delay, especially given that the Final Environmental Impact Statement for the Project has not yet been issued.
- DOE previously afforded interested parties 90 days to submit comments on the Draft Environmental Impact Statement (which was later extended to 120 days).⁶

For these reasons, SWN respectfully requests that DOE promptly grant the deadline extension until no earlier than Monday, July 27, 2015. Please do not hesitate to contact the undersigned with any questions.

Very truly yours,



John C. Ale
Senior Vice President, General Counsel & Secretary
SWN Production (Arkansas), LLC and
DeSoto Gathering Company, LLC

⁴ In addition to the criteria set forth in Section 1222(b), DOE announced an additional five (5) criteria it will consider in evaluating the Project. *See, e.g.*, DOE, Request for Proposals for New or Upgraded Transmission Line Projects under Section 1222 of the Energy Policy Act of 2005, 75 Fed. Reg. 32,940, at 32,941 (Jun. 10, 2010).

⁵ *See* Clean Line Plains and Eastern Project 1222 Program - Part 2 Application, at Appendix 4-A, at p. 6 ("Southwestern will own all Facilities located in Arkansas.").

⁶ DOE, Extension of Public Comment Period, Draft Environmental Impact Statement for the Plains and Eastern Clean Line Transmission Project, 80 Fed. Reg. 7,850 (Feb. 12, 2015).

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