

From: [doris brown](#)
To: [Plainsandeastern](#)
Subject: Clean Line Energy Partners (CLEP) Plains Eastern DOE 1222 application
Date: Tuesday, July 14, 2015 12:03:51 AM

Whether CLEP's proposal would provide public benefit exceeding the costs is questionable. For example CLEP says they "may (emphasis added) deliver 500 MW of low-cost power to a proposed converter station in Arkansas." Pg3-4. This calls into question whether CLEP would actually build the converter, which was not even in CLEP's plans until after the Arkansas PSC denied them public utility status.

Later CLEP notes "However, it is worth reiterating that no utility is obligated to buy power delivered by the Project. The power must be economical to be purchased."pg 6-2. It is the eastern market that CLEP is targeting. What is lower cost to eastern markets will likely be higher than the relatively low rates of Arkansas consumers.

CLEP trumpets tax revenue, but has already asked for and received tax abatements in Tennessee.

As these old school HVDC lines have been recently constructed in China and India, many of the construction jobs might not go to American workers, and the steel lattice towers may be imported.

CLEP has basically ignored decommissioning costs. They should be required to escrow an agreed upon estimate for such before any construction would take place.

CLEP has tried to minimize the importance of landowners. All county landowners could have been contacted of CLEP's proposition with a letter with the annual property tax bill in 2010, the year CLEP originally made this application. CLEP's Appendix 9B lists a letter to landowners almost four years later in December of 2014. This exemplifies the disrespect they show for the citizens who would bear the greatest uncompensated cost.

The 'demand' for transmission capacity that CLEP cites appear to consist of responses from wind developers that have not even begun construction, and any 'agreements' are probably not binding.

If demand were proved, CLEP is certainly not the only alternative. Although CLEP points to the 2008 Joint Coordinated System Plan as support, JCPS cautions "It was beyond the scope of this study to examine and model the potential for off-shore wind development along the East Coast due to lack of data availability, but those options should be examined in future transmission development scenarios. This study makes no judgment on the superiority or desirability of this scenario relative to others, which could and should be developed in future analyses of the Eastern Interconnection." Options include burying the line, upgrading existing lines, and distributed solar generation. Those create jobs, would be just as reliable, and would be more secure.

Public hearings on this 1222 application would be appreciated. Thank you.