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Sent: Monday 13, 10:16 PM
To: Plainsandean
Subject: Dear Secretary Moniz:

6.13.15

1222 Program
Office of Electricity Delivery and Energy Reliability (OE-20)
US Department of Energy
1000 Independence Avenue SW
Washington, DC 20585
plainsandean@hq.doe.gov

Dear Secretary Moniz:

Clean Line Energy Partners, LLC ("CLEP") has failed to meet the criteria required for the Department of Energy ("DOE") to participate in the Plains & Eastern transmission project ("Project") under Section 1222 of the 2005 Energy Policy Act ("EPAAct").

The studies cited by CLEP in its updated application fail to prove there is an "actual or projected increase in demand for electric transmission capacity" satisfied by the Project. This is reinforced by the Project's lack of subscription in the form of Power Purchase Agreements ("PPA") or other contractual obligations.

CLEP cites the 2008 Joint Coordinated System Plan ("JCSP"), as well as the Eastern Wind Integration and Transmission Study ("EWITS") as evidence of need for the Project. These studies are based on hypothetical exercises, not transmission expansion plans. These two studies should be dismissed as evidence.

CLEP has failed to demonstrate the Project is in the public interest, or adequately address its potential adverse impacts. On January 11, 2011, the Arkansas Public Service Commission ("APSC") denied Clean Line's request to become a public utility in the State of Arkansas. The potential benefits of the DOE-proposed Arkansas converter station have not been proven to outweigh the costs to landowners within the state.

CLEP's claim of "low cost clean energy for Arkansas" has not been vetted by the APSC, or subjected to challenges by qualified interveners within the state, and cannot be used as evidence of benefits.

In terms of the technical feasibility of the Project, significant questions have been raised by Southwestern Energy ("SWN") about corrosion of well casings and pipelines, as well as interference with electrical equipment, and the general lack of coordinated route development with, and notification of, property owners and gas operators in the Fayetteville Shale. Southwestern Power Resources Association ("SPRA") and SWN have both expressed concerns about potential financial and physical effects to existing infrastructure.

Additionally, the required interconnection studies are incomplete; therefore a comprehensive picture of the technical viability of the Project is not currently available.

Given its lack of subscription and the redaction of critical financial information in the application, it is virtually impossible to comment on the financial viability of the project. The public cannot comment on what it cannot see.

Finally, in reading Section 1222, it is not at all clear that Congress intended it to provide siting authority to override state law. Rather, it unambiguously states: "Nothing in this section affects any requirement of... any Federal or State law relating to the siting of energy facilities; or any existing authorizing statutes."

The intent of Congress is clear in the statute. Section 1222 projects must be included in an appropriate regional transmission expansion plan if they are proposed within a regional authority's territory. A finding to the contrary may only lead to prolonged litigation in federal court.

I am vehemently against DOE partnering with Plains and Eastern, and hope your conscience guides you to the same conclusion. Thank you.

Sharon Bean
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