



January 30, 2012

Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
1000 Independence Avenue SW.
Washington, DC 20585

RE: Comments to the 2012 National Electric Transmission Congestion Study

I am writing on behalf of the Natural Resources Defense Council (NRDC) to recommend that the DOE 2012 National Electric Transmission Congestion Study consider the following factors in evaluating the need for new transmission corridors.

NRDC is a national environmental advocacy organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing.

NRDC has a long history of efforts to protect and conserve the nation's natural resources, including in particular the nation's air, water and lands and resources managed by federal agencies. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California. And because we also recognize that some new transmission will be needed in order to significantly increase our use of renewable energy, we have engaged in transmission planning and policy making over the last several years. For example, we participated intensively in California's path breaking Renewable Energy Transmission Initiative which incorporated both economic and environmental considerations simultaneously in renewable energy zone and transmission planning. We presently represent environmental stakeholders on the Eastern Interconnection Policy Collaborative Regional Transmission Expansion Project (RTEP), the Western Electricity Coordinating Council (WECC) Regional Transmission Expansion Project, and WECC's Transmission Expansion Planning and Policy Committee (TEPPC).

Issues DOE should consider include:

1. Understanding how much additional available transfer capacity may be created by the retirement of coal fired power plants in all interconnections
2. Considering transmission impacts created by the establishment of renewable energy zones created by federal actions such as the Solar Programmatic Environmental Impact Statement being conducted by DOE and the Bureau of Land Management (BLM) in the Western Interconnection
3. Transmission needed to meet state RPS mandates in the eastern and western interconnections
4. How grid efficiencies created by regional and inter-regional transmission planning as required by FERC tariffs and rules, under Order 1000 affect possible congestion in all interconnections
5. The benefits of early consideration of environmental and cultural values in corridor selection

6. How non-wires congestion solutions such as energy efficiency, demand response, distributed renewable generation and grid optimization affect the perceived need for new transmission may alleviate congestion by both reducing load and supplying electricity from the distribution side of the grid in all interconnections
7. The impact of North American Electricity Reliability Council reliability standards on corridor utilization (especially corridor size) and transmission upgrades and the need for possible reforms in the Western Interconnection
8. Transmission that may be needed to meet the clean energy goals detailed by President Obama

Thank you for considering these comments.

Sincerely yours,

A handwritten signature in blue ink that reads "Carl Zichella". The signature is written in a cursive style and is centered within a light blue rectangular background.

Carl Zichella
Director of Western Transmission
NRDC