



StopPATH WV, Inc.

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

RE: Comments for Consideration in the Preparation of the 2012 National Electric Transmission Congestion Study

StopPATH WV, Inc. is a registered 501(c)4 social justice grassroots organization comprised of ordinary citizens, electric ratepayers and property owners who object to the Potomac-Appalachian Transmission Highline ("PATH") project because it is not needed, it is not wanted, it is destructive to West Virginia, and it is an obstacle to meaningful reform of U.S. energy policy. Our platform is based on sound energy policy, solid economic principles, and due process to ensure that transmission-planning decisions provide a fair and proper balance between corporate profit initiatives and the rights of individual citizens. Over the past three years, we have experienced firsthand the deleterious effects of DOE's prior congestion study determinations as they have applied to the PATH and TrAIL projects. We welcome this opportunity to comment on the 2012 National Electric Congestion Study and provide a realistic, practical account of how National Interest Electric Transmission Corridors have been utilized to trample citizens' rights and subvert due process, cause an undue financial burden upon our electric ratepayers, and produce an environmental injustice upon West Virginians.

There are three equally effective solutions to relieving transmission congestion: Additional generation near load, load management and increased transmission. In focusing on only one solution and designating National Interest Electric Transmission Corridors to enable new transmission lines from the west, the DOE creates just as many problems as they solve. By designating wide swaths of Appalachia as a NIETC in the past, DOE has been, in effect, creating a sacrifice zone where the rights of the few are undermined by the needs of the many.

When economic congestion in east coast population centers is solved by the building of new transmission projects originating from the west, electricity prices may be lowered downstream of the relieved congestion bottleneck. However, this same action also raises electricity prices upstream of the congestion bottleneck by leveling prices throughout the region. Over the past few years, West Virginians have seen their electricity prices climb an average of 50 percent through DOE's misguided efforts to produce a corresponding drop in prices in the DC metro area by solving previous congestion with transmission projects such as TrAIL. As well, West Virginians must pay their share of the cost of new transmission projects in the region.

When the NIETC-determined solution to congestion is always building new transmission lines from the west, West Virginians are continually required to sacrifice in other ways as well. More transmission lines mean more coal-fired generation in our state, which brings increased mining and

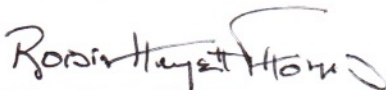
burning of coal that confiscates our land and poisons our air, water and environment. Once the electricity is produced, the transmission lines require further sacrifice on the part of West Virginians who are forced to surrender their property to new transmission rights-of-way and subjects them to a lifetime of living in close proximity to infrastructure producing electromagnetic fields that many scientists are convinced cause health problems.

When new transmission is the only solution to congestion recognized and implemented, the eastern load centers receive lower prices and increased reliability, while West Virginians receive higher electric bills, health problems, a devastated environment, and have their property taken by eminent domain. This is hardly a fair exchange.

We urge DOE to give evenhanded attention to both non-transmission and wreck and rebuild congestion solutions in their 2012 Study and abandon the status quo of additional new transmission coming from the west. Offshore wind has incredible potential for a clean, renewable and plentiful generation source right at the east coast's doorstep. Unfortunately, it has previously been given short shrift by federal energy policy and incumbent investor-owned utilities, who depend on transmission's guaranteed profit center to pad their bottom lines. In addition, the increased export of coal abroad to China and other fast developing countries drives increasing domestic coal prices, making transmission of electricity produced from coal more costly to both West Virginians and end users on the east coast.

DOE must look at the complete picture of our country's energy future instead of getting bogged down in the wants of incumbent utilities to designate narrow NIETCs that correspond with proposed transmission projects. The focus of the 2012 Study should not be on furthering the desires of investors and usurping state authority to site transmission, but on a fair, impartial, logical analysis of energy policy that will usher us all into a smarter, cleaner, and more equitable future.

Sincerely,



Robin Huyett Thomas,
President
StopPATH WV, Inc.