



State of Utah

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Public Service Commission

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Commissioner

Transmission Infrastructure Program
Western Area Power Administration
PO Box 281213
Lakewood, CO 80228-8213

April 2, 2009

Re: Public Comment regarding Transmission Infrastructure Program to be implemented from Section 402 of the American Recovery and Reinvestment Act.

Dear Sir or Madame;

The Utah Public Service Commission (Utah PSC) submits the following comments on the proposed principles, policies, and procedures published by the Western Area Power Administration (Western) in the March 4, 2009, Federal Registrar, Vol 74. No. 41, p. 9391. The Utah PSC is the State of Utah's utility regulatory commission for the public utilities operating in the state. The Utah PSC also implements Utah's Carbon Emission Reductions for Electrical Corporations statutory provisions, see, Utah Code Sections 54-17-601 et seq., whose renewable energy portfolio standards and renewable energy certificate provisions are applicable to all electric utilities operating in the State, cooperatives, private investor owned, and municipality or government entity owned.

The Utah PSC notes that coordination among multiple renewable energy electricity generation and electric transmission projects will be necessary and occur with greater frequency in developing the resource potentiality within Western's operating area. In that regard, the Utah PSC supports Western's proposed guiding principles to determine whether a project "1. Is in the public interest." and "2. Will not adversely impact system reliability or operations, or other statutory obligations." Further, the Utah PSC supports Western's project evaluation criteria, including whether a project "1. Facilitates the delivery of energy from renewable resources to market. 2. Is in the public interest. [and] 3. Will not adversely impact system reliability or operations, or other statutory obligations." The Utah PSC encourages Western to implement and apply these principles and evaluation criteria by inviting and having the participation of the Utah PSC and other, similar, state utility regulatory commissions in the Transmission Infrastructure Program and project evaluations. State utility regulatory commissions have unique perspective and information, due to their roles and duties concerning electric utility operations in their states, and may make useful and significant contributions to Western's future efforts. A number of the state utility commissions are already involved in multi-

state collaborations addressing similar area-wide coordination and integrated operation issues which underlie Western's proposed principles, policies and practices.

In addition, the Utah PSC supports Western's governing principle to ensure the Transmission Infrastructure Program "provides an opportunity for participation of other entities in constructing, financing, owning, facilitating, planing, operating, maintaining, or studying construction of new or upgraded transmission lines" The State of Utah recently created the Utah Generated Renewable Energy Electricity Network Authority (Utah GREEN) , whose purpose is to support renewable energy resources whether inside or outside of Utah. This support may include financing transmission line projects, and other improvements. See, Utah Code Sections 63H-2-101 et seq. Partnering Western's efforts with Utah GREEN's efforts is consistent with the policies and goals of both the federal and state acts.

The Utah PSC appreciates the opportunity to comment on Western's Transmission Infrastructure Program and looks forward to collaborating with Western in the development of necessary electric transmission capabilities needed for the renewable energy resources within Western's operating area.

Sincerely,

Ted Boyer
Chairman,
Utah Public Service Commission