

From: [Smith, Julie A \(OE\)](#)
To: [John N. Wachtler](#); [Cheryl D. Feigum](#)
Cc: [Storm, Bill \(COMM\)](#)
Subject: FW: DOE docket PP-398 and DOE EIS 0499 – Great Northern Transmission Line Proposal
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Another GNTL scoping comment.

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From: Luis Contreras [mailto:docontreras@gmail.com]
Sent: Thursday, August 14, 2014 12:29 PM
To: Smith, Julie A (OE)
Subject: DOE docket PP-398 and DOE EIS 0499 – Great Northern Transmission Line Proposal

Julie Ann Smith
Office of Electricity Delivery and Energy Reliability (OE-20)
U.S. Department of Energy

Dear Ms. Smith,

Please consider my comments for your review:

Nick Akins, AEP Chairman, in "**Electricity Sales Anemic for Seventh Year in a Row**" WSJ, July 28, 2014, said "this is a new world for utilities." Mr. Akins is right *we are running out of time.*

1. Climate change requires new energy rules:

We need farms, farmers and food. Transmission lines are 1970's technology destroying hundreds of acres of farmland. We have available, acres of rooftops, parking lots, and even roads for new solar PV solutions. Nothing will grow on the land already

taken, and we can use it to generate electricity at the point of use. Private property rights are the foundation of our democratic society; eminent domain abuse will create social unrest and only benefit lawyers taking money from landowners.

2. Our climate has already changed, all we can do is try to adapt

It is all about lead time. Local Solar PV energy is installed in days, not years! China in the last six months, to reduce carbon dioxide pollution, installed 3.3 gigawatts of solar PV energy. Think about it, 180 days for 3,300 megawatts of power up and running! This is the equivalent of six large coal plants taking years to approve and many more to build, with no transmission lines. Let me say it again, this is happening today not in the future: local solar systems are installed in days, transmission lines take years just to get approval. Local solar energy solutions are superior silicon and micro-technology with many innovations in the pipeline, and the highest number of great paying jobs.

3. DOE support of renewable energy is missing the big picture and making poor energy choices

DOE, with this Canadian transmission line and with the endorsement of Clean Line Energy Partners, is choosing inferior energy technology. Remote, renewable solutions are not sustainable, they harm people, the planet, and their total life cycle cost is much higher than the promised benefits. The "renewable" flag is black, not green. Coal plants love transmission lines connected to the grid and will use them to wheel black electrons. One more transmission line will keep coal plants around for many more years.

4. We need renewable and sustainable energy

"Renewable energy solutions" are a misleading idea dealing only with availability of resources. Renewable simply means: we have all the resources we need and we are not going to run out. For example, sunlight, wind, dams versus fossil fuels. Like in Real Estate, the three most important things for

energy generation are location, location and location. All **remote**, bulk energy generation systems are not sustainable due to the total carbon footprint of the transmission and distribution system, the power losses, and the high vulnerability to terrorist attacks.

5. Remote generation is a dying industry

Transmission lines and any infrastructure takes years to approve and years to build. We need to get on with climate change now. FirstEnergy and many other utility shares have been downgraded in August 2014 by USB AG. AEP top executives have been selling their shares in the last three months, with the VP of Transmission, the jewel of AEP, Lisa Barton selling all her shares. On the solar side, Elon Musk new gigafactory for low-cost high-efficiency solar PV in New York and the rapid growth of electric vehicle (EV) sales and power charging stations, with the high performance batteries providing EV and PV generation synergy is what DOE should be promoting.

6. Remote power is not safe

A single storm can take down Canadian hydro generation, same as a tornado or dust storm knocking out entire wind farms for Clean Energy.

7. Remote power is not sustainable or secure

The total carbon footprint of transmission lines with 150 to 200 foot wide easements, a permanent environmental change with clear cut of trees and vegetation plus the release of carbon sequestered in the ground is unacceptable. The use of herbicides spraying of the ROW using helicopters or broadcast airborne systems carries chemicals miles away from the transmission lines, contaminating drinking water sources and destroying organic farms.

8. Remote power is not secure

With billions of dollars spent on Homeland Security, why would DOE want to increase the risk of a terrorist attack on highly vulnerable transmission lines, substations and additional

distribution lines?

Respectfully,

Dr. Luis Contreras