



Wind Task Force Draft Report Comments

Comment Period: September 8 to October 9, 2005

Aird, Brenda (Brenda_Aird@blm.gov)

Thank you for the opportunity to participate in and review the Draft Wind Task Force Report prepared in response to your Clean and Diversified Energy Initiative for the West.

Lands managed by the Department of the Interior (DOI) contribute approximately 8% of today's domestic wind energy production. The Bureau of Land Management (BLM) manages almost 100 rights of ways for wind testing and development. Wind projects on public lands currently have the capacity to produce 500MWs of wind energy. Another three projects undergoing NEPA review on public lands are anticipated to add an additional 900MWs of capacity in 2006. As mentioned in your report, in 2005 the BLM completed a programmatic wind EIS that amended land use plans and assessed wind development in the 11 western states. With the completion of this EIS, BLM is well positioned to help the Western Governors meet Clean and Diversified Energy Initiative goals. The EIS anticipates the development of over 3000MWs of wind energy development on public lands over the next twenty years.

We agree with the recommendations of the Wind Task Force on issues related to DOI's role in wind energy development and would like to add the following comments on the draft report:

Page 68. *Recommendation: Transmission Permitting*

We agree with the recommendation on transmission permitting. BLM is a signatory to the existing WGA Transmission Permitting Protocol agreement. In addition, BLM is committed to the western transmission right-of-way (ROW) corridor planning efforts. A west-wide Programmatic ROW Corridor EIS is currently being developed pursuant to the provisions of Section 368 of the Energy Policy Act of 2005. The Notice of Intent to prepare the Programmatic EIS was published in the Federal Register on September 28, 2005. Public scoping meetings are scheduled in each of the western states from October 25 to November 3, 2005. The Act directs that the EIS be completed in two years.

Page 69. *Recommendation on Wildlife*

We agree with the report's recommendation that research to provide additional information on how to reduce wind farm risk to birds and bats should be supported.

Page 70. *Recommendation on State siting activity and wind energy*

We would recommend that State working groups include representation from federal land management agencies, like the BLM. Many wind farm projects extend across land ownership boundaries or require access across federal lands.

Page 79. *Recommendation to support government procurement of wind power.*

The Department supports demonstration of leadership in the purchase of renewable energy, including wind power. Numerous DOI facilities are powered in part by geothermal heat pumps, solar photovoltaics and wind turbines. Interior and its constituent bureaus participate in the Federal Energy Management Program (FEMP) that prescribes annual goals for energy efficiency and the purchase of renewable energy for agency facilities. The Department of Energy provides oversight for this program. Interior will be purchasing or using increasing amounts of renewable energy to meet Federal targets mandated in the recently enacted Energy Policy Act.

Once again, we appreciate the opportunity to comment on the draft Wind Task Force Report. We look forward to your final report.

Richard Brill (rbrill@delugeinc.com)

Deluge, Inc. congratulates the Task Force for producing an outstanding first round report on wind energy for the Clean and Diversified Energy Initiative. We request that the Western Governors' Association consider Deluge, Inc.'s sustainable Natural Energy Engine™ technology as a viable alternative to conventional energy technologies that will help the states achieve their clean and diversified energy objectives.

The Natural Energy Engine™ (NE Engine™) is an emerging revolutionary, energy efficient, pollutant free, cost effective technology that can assist the Governors in realizing their goal of developing 30,000 megawatts of clean energy in the West by 2015 and increasing energy efficiency 20 percent by 2020. The NE Engine™ uses hot water, at about 180°F, as its sole source of fuel. This is a proven technology that can use a variety of different sources not affected by fuel volatile markets to heat the water that fuels it. Deluge, Inc. recently won the 2005 FLC Outstanding Technology Development Award using the NE Engine™ to successfully pump oil out of the ground, without the use of electricity, during a project undertaken last year at the Rocky Mountain Oil Testing Center in Wyoming (see <http://delugeinc.com/NEWS%20Page.htm>).

Because the Natural Energy Engine™ does not need electricity to power it, this is a complementary technology to wind. The NE Engine™ can operate in the same remote locations as wind technology, using solar thermal or geothermal energy to heat the water that fuels it. Another important feature of this technology is that the water used to power the engine is continually recycled through the system. The Natural Energy Engine™ uses the same generator as wind powered generators, therefore, no additional parts or training would be required to generate electricity using this technology. Combining the Natural Energy Engine™ with wind technology can make a reliable 24 hour a day energy producing operation.

Environmentally, the Natural Energy Engine™ is less harmful than wind powered generators. There are no avian or bat mortality issues; the technology does not have the same visual impact as wind generators, it is a super-quiet engine and, unlike wind towers, the NE Engine™ does not require flashing lights.

On page 11 of the report, the Northridge earthquake occurred in 1994.

David Couture (DCouture@tep.com)

Please see the following link to view UniSource Energy Services' and Tucson Electric Power's submission:

[UniSource Energy Services and Tucson Electric Power](#)

Nykole Littleboy (nykolelittleboy@utah.gov)

The State Energy Program (SEP) is a program housed within the Utah Geological Survey whose mission is to provide energy information, program support and access to federal funding for energy efficiency, energy conservation and renewable energy initiatives in Utah. We have reviewed the Western Governors Association's Wind Task Force Report and commend and appreciate the effort involved in creating this document. The identified goal to "*develop 30,000 MW of clean energy in the West by 2015 from resources such as energy efficiency, solar, wind, geothermal, biomass, clean coal technologies, and advanced natural gas technologies*" is a goal that is highly supported by our program and by the working groups that we administer. Like the Western Governors, we also believe that there is untapped wind energy potential in the western states, and we feel that more could be done to develop this resource in Utah.

We support the Wind Task Force Report's Top Ten Recommendations for stabilizing financial incentives such as the PTC, efficiently utilizing and expanding transmission, conducting integration studies, and promoting wind energy procurement. These actions would be highly beneficial to the promotion and development of wind energy in the state of Utah. The report's recommendations and the defined benefits and impacts of wind energy are generally compatible with the SEP's observations and with the statements outlined in the Utah Wind Working Group's recent position paper.

Once again, thank you for the opportunity to provide you with comments and the efforts of the Task Force in creating this document.

Sarah Wright (sarah@utahcleanenergy.org)

Utah Clean Energy is a public interest group working in Utah to promote a diversified energy system that incorporates energy efficiency and renewable resources. Utah Clean Energy works with Utah's State Energy Program and the Department of Energy Wind Powering America program to facilitate the Utah Wind Working Group and I am currently serving on Governor Huntsman's energy advisory council. Utah Clean Energy is grateful for the work of the Western Governor's Association, the Clean and Diversified Energy Advisory Committee and Wind Task Force Members. Utah Clean Energy appreciates the opportunity to provide comments.

As described in the Wind Task Force report, the west has enormous wind energy potential offering substantial benefits to our energy system. Wind will serve as a hedge against the risks associated with volatile fuel costs and a carbon constrained future, while providing significant environmental benefits and an excellent venue for economic development in our rural communities.

There are a number of barriers that inhibit wind development in the United States. The task force did an excellent job defining the barriers and developing recommendations to enable the West to capitalize on our abundant wind resources.

Utah Clean Energy strongly supports the top 10 policy recommendations outlined in the report; we would like to see renewable portfolio standards included in the recommendations. Currently there are 19 states that have instituted renewable portfolio standards, including eight WGA states. Additionally, Utah Clean Energy supports: 1) better planning coordination among regional

transmission, resource acquisition, and generators; 2) reforms in utility regulation and planning, including accurate risk-evaluation of traditional resources and provisions for rate of return on renewable energy power purchase agreements. In summary, the task force did an excellent job outlining the barriers and policy recommendations, and their findings are in line with the findings and recommendations of the Utah Wind Working Group.