

Comments of the Committee on Regional Electric Power Cooperation on Department of Energy Draft National Interest Electric Transmission Corridor Designations

The Committee on Regional Electric Power Cooperation (CREPC) endorses the attached comments of the Transmission Expansion Planning Policy Committee (TEPPC) of the Western Electricity Coordinating Council (WECC). CREPC shares TEPPC's concern that the proposed designation of the Southwest National Interest Electric Transmission Corridor (NIETC) is based on limited technical analysis by the Department of Energy (DOE), lack of clarity in the definition and measurement of congestion, and lack of public vetting of the data and interpretation of analyses used by DOE.

In addition, CREPC finds that the analysis presented by DOE is NOT adequate to support the designation of a Southwest NIETC. The designation of a NIETC is a major step along a path for the federal government to pre-empt the authority of states to site transmission lines. Any designation of a Southwest NIETC must be based on a more robust analysis of information than DOE has thus far presented.

CREPC also finds that the proposed designation does not adequately respond to concerns we raised in [comments](#) on the DOE's August 6, 2006 National Electric Transmission Congestion Study. In our comments, CREPC asked that DOE:

- Make clear how various inputs were used to reach the conclusions in the August report; and
- Join with WECC in a workshop to review the strengths and weaknesses of the congestion metrics developed by the Western Congestion Assessment Task Force and that the workshop be a first step toward developing congestion metrics that have broad support among the industry and states/provinces.

CREPC is a joint committee of the Western Interstate Energy Board and the Western Conference of Public Service Commissioners. All regulatory, energy planning and siting agencies in the states and provinces in the Western Interconnection are eligible to participate in CREPC.

Attachment: TEPPC comments