

Sugarloaf Conservancy

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July 12, 2010

John Schnagl
US Department of Energy
Director Transmission Adequacy, Office of Electricity Delivery and Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Schnagl:

I read with interest this past Wednesday that the Environmental Protection Agency (EPA) is proposing a new rule called the Clean Air Interstate Rule. The aim is to cut sulfur dioxide emissions by 71 percent from 2005 levels by 2014 and nitrogen oxide emission by 52%, in the same period. It is my understanding that this rule is to tighten restrictions on pollution from coal-burning power plants in the eastern portion of the country.

It appears to me that the current policy (put in place under President George W. Bush) of providing substantial rate guarantees for transmission projects for the purpose of bringing coal-fired power to east coast states is counter-productive to the goals of the Clean Air Interstate Rule.

Recently the Department of the Interior formed a formal partnership called the Atlantic Offshore Wind Consortium for the purpose of coordinating regionally prominent issues surrounding the development of offshore wind along the Atlantic outer continental shell.

If the Obama administration is serious about developing wind power, the current rate guarantees for coal-fired power are not only counter-productive, they are detrimental to achieving this goal. I therefore respectfully request that the Department of Energy/FERC consider the possibility of rescinding permanently or temporarily rate guarantees previously issued by FERC for transmission lines not yet completed and a moratorium on any new transmission lines that would primarily provide power from dirty coal generated power plants. Energy markets fell 0.1% in 2008 and another 3% in 2009. Surely there is sufficient time to develop offshore wind power without the necessity of constructing more transmission lines from dirty coal-fired power plants.

I also recommended that you use your Federal authority (if possible) to freeze all projects not substantially completed or started until a complete review of the new generating sources and the related transmission infrastructure can be completed. What purpose does it serve to build transmission lines from dirty coal-fired power plants when the current goal is to eliminate or at least reduce the amount of electricity produced by these plants? New transmission lines will be needed, but not from the west to the east as is currently being proposed, but from clean sources off the east coast. These turbines would not only produce clean renewable energy, but the transmission of the power can be completed using the environmental advantage of HVDC underground transmission lines which will also reduce the danger of overhead lines being attacked by terrorists. .

Unless the Federal Government is willing to take appropriate action to stop new transmission lines from coal fired power plants, the opportunity to develop offshore wind resources will be seriously impacted for years to come.

Thank you for your consideration. I am,

Sincerely yours,

Douglas S. Kaplan

President
Sugarloaf Conservancy

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