



## WESTERN GOVERNORS' ASSOCIATION

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October 31, 2013

Mr. Christopher Lawrence and Ms. Julie Smith  
Office of Electricity Delivery and Energy Reliability  
Mail Code: OE-20  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585

Dear Mr. Lawrence and Ms. Smith,

The Western Governors' Association (WGA) is submitting these comments in response to the Department of Energy's (DOE) Request for Information (RFI), dated August 29, 2013<sup>1</sup>. The RFI outlines a proposed process to establish a coordinated series of meetings and other actions for qualified transmission projects, via an Integrated, Interagency Pre-Application process (IIP).

Western Governors appreciate efforts to streamline the siting and permitting process for transmission. Western Governors have a clear goal to site and permit transmission lines three years after a completed application has been submitted. The Governors can be supportive of this effort if there are *guarantees* to a reduced NEPA timeline. They believe that, if structured appropriately, the IIP process can serve to improve early collaboration and coordinated decision-making. To that end, WGA recommends that the IIP process be implemented in conformance with the following principles:

*Participation in the process should be mandatory for all federal agencies with responsibilities for transmission siting, review and approval.*

These agencies should be required to participate in meetings at the project concept stage through the project application process, and they need to be incentivized to help site lines. The iterative process proposed in the RFI will only be successful if agencies --both federal and state -- provide thorough feedback throughout the series of pre-application meetings. While federal agencies should be required to participate in the IIP process, it should *not* be mandatory for project proponents. The proposed process needs to maintain flexibility to fit the complexity of a given transmission project and allow developers to opt out of the IIP process without retribution.

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<sup>1</sup> 78 FR 53436, August 29, 2013

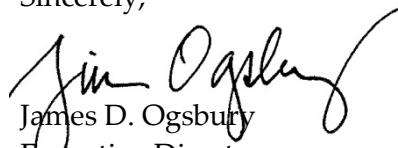
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*Clarification is needed to specify how the collected data will be used to streamline the NEPA process.*

Under the proposed IIP structure, federal, non-federal and project proponents will be allocating resources to develop accurate and complete information on the project. The comprehensive work facilitated and collected by DOE in the early stages of project planning *must* inform the NEPA process, become a part of the administrative records used in NEPA scoping, and assure a reduction in the NEPA timeline. Process discipline needs to be applied that is consistent, transparent and creates schedule predictability. All efforts should be focused on reducing redundancy and duplication in the collection of public input.

WGA looks forward to engaging further on this issue and reviewing the Implementation Plans from the respective agencies.

Sincerely,



James D. Ogsbury  
Executive Director