

## Plainsandeastern

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**From:** Ron Hairston <ron.hairston@ph-clan.com>  
**Sent:** Tuesday, June 23, 2015 7:09 PM  
**To:** Plainsandeastern  
**Subject:** Plains & Eastern Clean Line Transmission Line - Part 2 Application  
**Attachments:** Ltr RJH to DOE 150619.pdf

Please include the attached comments to the application under consideration regarding the Plains & Eastern Clean Line Transmission Line project.

The courtesy of a receipt of this email and the attached comments would be appreciated.

Ron Hairston

Ron Hairston  
1786 County Road 3456  
Clarksville, AR 72830-9276

June 19, 2015

US Department of Energy  
Office of Electricity Delivery and Energy  
Reliability (OE-20), 1222 Program  
1000 Independence Avenue SW  
Washington, DC 20585

Reference: Plains & Eastern Clean Line Transmission Line – Part 2 Application

Dear Sir or Madam:

As in my letter dated June 7, 2015, I'm writing to you on behalf of my friends and neighbors who stand to suffer egregious financial harm should Department of Energy grant Plains & Eastern Clean Line approval to construct, operate, and own the proposed transmission line under the provisions of the 2005 Energy Policy Act.

I and many others found in the wake of the this transmission project are adversely impacted by a "perfect storm" created by the combined effects of Sections 1221, 1222, 1223, and 1224 of the 2005 Energy Policy Act. While the intention of these laws may have been worthy, the unintended consequences that flow from its application carries an unprecedented magnitude of harm to property owners.

For details regarding the aforementioned harm, please see my correspondence directed to Plains & Eastern Clean Line EIS (courtesy copy to be sent under separated cover):

- February 4, 2015, Filename: Amend EIS Draft Dec 2014 - Special Circumstances 150204
- February 17, 2015, Filename: Public Comments 3-min 150217
- February 19, 2015, Filename: Public Comments 3-min 150219
- February 23, 2015, Filename: Comments RJH - EIS Draft Dec 2014 Environ Justice 150223
- March 16, 2015, Filename: Amend EIS Draft Dec 2014 - Property Values
- April 18, 2015, Filename: Comments RJH - EIS Draft Dec 2014 Cost Analysis

The "perfect storm" of unintended consequences can be described as follows:

Section 1223 describes “Advanced Transmission Technologies” that increase the capacity and efficiency of facilities used for electric power transmission. The technology used by the Applicant is listed under subparagraph (a) (9) as high-voltage DC technology (HVDC). While HVDC and the system proposed by the applicant does provide a means for increasing capacity and efficiency by operating at 600,000 volts (600KV), the hissing and crackling of corona noise created by such high voltages carries with it an unprecedented level of noise pollution that extends far beyond the right-of-way and the area of compensation. Analyzing data published in the Resource CD, we calculate that there is high potential for financial damage to properties that may be found 1,000 ft, 2,000 ft, or more to either side of the transmission line. This impacts an unprecedented number of adjacent property owners as well as those whose land falls under the right-of-way. Recognition of this adverse impact as well as the impact of 200 ft tall support structures are an “inconvenient truth” that has been denied in the draft Environmental Impact Study (dEIS) and by the Applicant who is positioned for financial gain at the expense of property owners. Creating and studying representative appraisals (made by registered appraisers familiar with the area of impact) for properties within 2,000 ft of the proposed line may be the only way to fairly assess the impact prior to permitting of the Project. For more detail on the impact of corona noise projected by a 600 KVDC transmission line, please review YouTube Video “Corona Noise Simulator” at <https://youtu.be/Kk09d2a-qqw> .

Section 1224 provides incentives that reinforce the use of Advanced Transmission Technologies. The incentives in effect provide fuel to the “perfect storm” by supercharging the Applicant’s desire to use HVDC regardless of the consequences to property owners caught in the path of the project.

Section 1221 paragraph (f) provides for compensation to property owners within the right-of-way. However, in view of the extensive collateral damage caused by the unprecedented level of corona noise and visual pollution extending from the 600 KVDC, 3,500 Megawatt, transmission line, compensation falls woefully short. The unjust outcomes that prevail are another “inconvenient truth” denied by the Applicant. As a point of comparison, we recognize that oil and gas wells routinely impact property owners far beyond the well site or pad. Royalties provided to property owners attempt to provide just compensation for what is taken from every property impacted. Using the same line of thought, the same concept of justice, it’s time to recognize that the use of Advanced Transmission Technologies has adverse financial impacts far beyond the right-of-way. Property owners who are measurably impacted, adjacent owners and those under the right-of-way, should receive compensation so that their outcomes will be just.

Section 1222 paragraph (b) provides for partnering with an entity outside the purview of DOE for the construction, operation, and ownership of “New Facilities” such as the Plains & Eastern Clean Line Transmission Project. However, the requirements for New Facilities and partnering entities (Plains & Eastern Clean Line) do not include protections to property owners from the far reaching impacts of the Advanced Transmission Technologies (HVDC) that DOE encourages in Sections 1223 and 1224. Nor do the requirements take into consideration the impact of Section 1221 that

inappropriately limits the range of compensation to the right-of-way thus ignoring a huge cost that will be borne by property owners who are measurably affected.

In conclusion, the conditions created by shortcomings in Sections 1221 through 1224 of the 2005 Energy Policy Act, when taken together, create a "perfect storm" that fails to justly regulate a project such as Plains & Eastern Clean Line in a way that ensures just outcomes for those measurably impacted. Should DOE grant approval to the Applicant for this project, an unprecedented level of financial harm would come to property owners while a private entity profits from their loss.

We trust that your decision will reflect your sense of justice and that DOE will not approve this project as long as the inequity borne by stakeholders is ignored.

Sincerely, and on behalf of my neighbors,



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