Plainsandeastern

From: Luis Contreras <doccontreras@gmail.com>
Sent: Monday, July 13, 2015 2:16 PM
To: Plainsandeastern
Subject: P&E Part 2, Section 1222: Creating Doubt to acquire easements is unethical
Attachments: Creating doubt to acquire easements is unethical - July 13.pdf

July 13, 2015

Creating doubt to acquire easements is unethical

Dear Secretary Moniz,

When the Tobacco companies could no longer pretend smoking was safe, their PR advisors decided to *create doubt* getting 30 years of deadly revenues. *Creating doubt on having the right to use eminent domain*, P&E got 20 miles of "voluntary" easements. These agreements should be null and void, taken under false pretenses. Below are the facts:

1. The linchpin of P&E Project is a purchase agreement with TVA, but *TVA will not sign a PPA with P&E:* the 2014 1000-MW natural gas Allen power plant, and the 2015 Draft Integrated Resource Plan are proof.
2. P&E created doubt with *TVA-P&E Memo of Understanding*, pretending to have a PPA with TVA.
3. P&E is using **Clean Energy** to solicit online comments in support of P&E, attack the TVA Board, and promote P&E as if it were a done deal and the only wind energy available. Here is a recent post: **TVA 2015 Draft IRP Views Clean Energy Through a Blurred Lens**, March 24th, 2015, *with a map of the P&E line*:

> *"TVA is equally shortsighted in the way it treats wind energy in the draft IRP. In particular, I am disappointed with TVA's failure to align its plan with the market as demonstrated by the Clean Line Plains & Eastern HVDC wind power transmission project."*

What is the relationship between *Clean Line Energy* and *Clean Energy?*

Why would DOE participate in a project based on *questionable business practices?*

Respectfully,

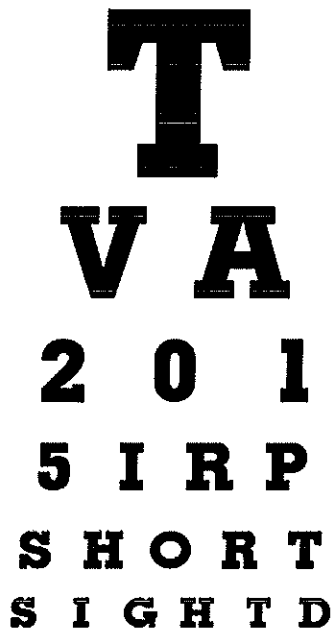
Dr. Luis Contreras

TVA 2015 Draft IRP Views Clean Energy Through a Blurred Lens

March 24th, 2015 › Clean Energy, Energy Efficiency, Utilities ›

Dr. Stephen A. Smith

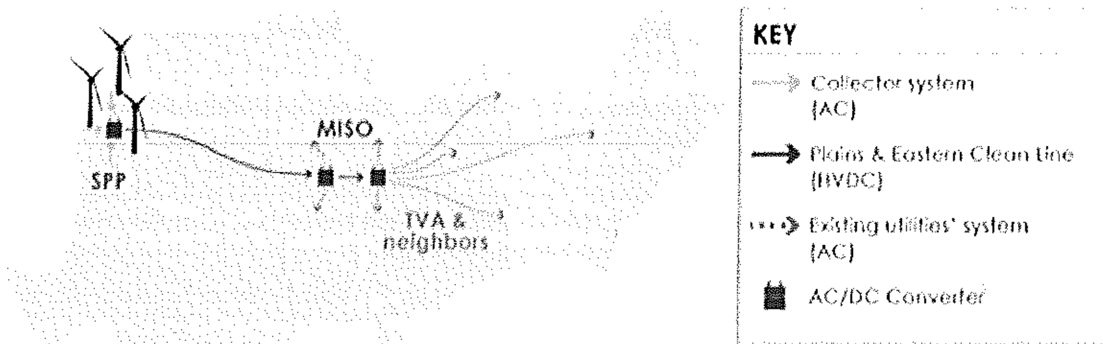
http://blog.cleanenergy.org/2015/03/24/tva-2015-draft-irp-views-clean-energy-through-a-blurred-lens/



If you're like me, you are nostalgic for the days when the Tennessee Valley Authority (TVA) brought innovation, increased economic development and low-cost energy to the Tennessee Valley. TVA's recently released draft 2015 Integrated Resource Plan (IRP) outlines five alternate energy scenarios under which TVA could implement various resource planning strategies to meet both short- and long-term energy demands. Unfortunately, TVA's draft IRP does not renew its legacy and instead undervalues critical cost-effective options that would help families and businesses cut energy bills.

We applaud TVA's efforts to retire coal units during the 2015 IRP planning process, but we continue to feel that TVA did not balance its need for capacity with thoughtful analysis on how much replacement capacity was actually necessary. This resulted in TVA's decisions to make significant investments in large natural gas plants (at Paradise, Allen) and in retrofitting old coal units (at Shawnee).

> *TVA continues to view clean energy resources through a blurred lens. TVA underestimated performance and over-estimated costs of energy efficiency, resulting in a draft 2015 IRP that contains less energy efficiency than the 2011 IRP. By including artificial constraints and unnecessary growth caps, TVA improperly devalued the merits of energy efficiency. To TVA's credit, there was a significant amount of effort with stakeholders to bring forth wind data that would accurately reflect the dynamic nature of wind energy based on the latest technologies and current market trends. Unfortunately, TVA ultimately chose outdated wind data, resulting in a draft IRP that includes very little low-cost wind energy.*



This map is intended for illustration purposes only and does not represent a proposed route.

TVA is equally shortsighted in the way it treats wind energy in the draft IRP. In particular, I am disappointed with TVA's failure to align its plan with the market as demonstrated by the Clean Line Plains & Eastern HVDC wind power transmission project. Although TVA acknowledged that wind generated in western Oklahoma and north Texas is highly productive (operating at a very high "capacity factor"), TVA selected a highly prejudicial method for valuing wind power's contribution to its peak capacity needs. Industry experts recommended a capacity credit of at least 40% (and suggested an even more realistic credit of 50%), TVA assumed a mere 14% capacity.

> *TVA's decision to cherry-pick the only calculation method that applies a lower wind capacity value demonstrates a level of disengagement from market and performance data. It feels as if TVA's "mind" was made up on wind before the IRP planning processes even started. Even with promising projects being suggested for Tennessee and Alabama using cutting-edge technology, TVA's evaluation for In-Valley wind relied heavily on outdated wind technologies that were deployed over four years ago. TVA had access to, but ultimately excluded, more current data provided by industry experts regarding available technologies best suited for our large regional wind resource.*

TVA 2015 IRP Public Comment Period Closes – What's Next?

April 28th, 2015

Clean Energy, Utilities › Angela Garrone

http://blog.cleanenergy.org/2015/04/28/tva2015irp/

This week marked the end of the public comment period on the Tennessee Valley Authority's Draft 2015 Integrated Resource Plan (IRP). SACE staff, who have been engaged in the planning process for the 2015 IRP since it began almost two years ago, submitted technical comments outlining concerns with how energy efficiency (EE) and renewable energy (RE) were treated in the Draft IRP.

While TVA claimed that these decisions (below) were consistent with the 2011 IRP, this capacity expansion policy exists concurrently with TVA's failure to invest in energy efficiency and meet the modest energy efficiency commitments made in the 2011 TVA IRP.

- Approved construction of larger-than-necessary gas plants at Allen and Paradise to serve not only reliability needs, but future growth needs
- Purchased the Choctaw gas plant in Mississippi
- Invested in costly environmental upgrades at the Shawnee coal plant, again without an immediate power need

More disappointing is the response to data on the wind power market: TVA's Draft IRP relies on inflated cost assumptions and outdated technology assumptions, resulting in little to no wind development and suggesting that TVA may soon exit the wind market entirely at the very time when other Southeastern utilities are deepening their investment. In fact, TVA's sensitivity analyses show that if TVA accepts the availability of cheap, plentiful and reliable wind energy (particularly from wind powered high voltage direct current transmission), then wind resources will drive down customer costs and rates, becoming one of TVA's leading energy resources as soon as the project can be completed.

Clean Energy online petition equates P&E with wind energy.

Support Clean, Wind Energy for the Southeast

Several utilities throughout the Southeast are purchasing low cost wind power from the Great Plains. But transmission restraints are limiting access to additional wind energy resources. Constructing new High Voltage Direct Current transmission projects could substantially increase access to low cost wind power resources. The U.S. Department of Energy is reviewing potential environmental impacts for the proposed Plains and Eastern Clean Line (wind power transmission) project. This project would inject substantial amounts of wind power into the Southeast. Submit a letter to the Department of Energy supporting the development of high capacity transmission projects that will bring more wind energy to the region.

Use the form below and send a letter today:
Tell the Department of Energy to support wind!

Send a Letter Now
Subject: Support Clean, Wind Energy for the Southeast
Your Letter:

To Whom It May Concern:

The proposed Plains and Eastern Clean Line transmission project would greatly expand

Tell the Dept. of Energy to support low-cost wind power!

July 1, 2015

cleanenergy.org

ACTION ALERT!

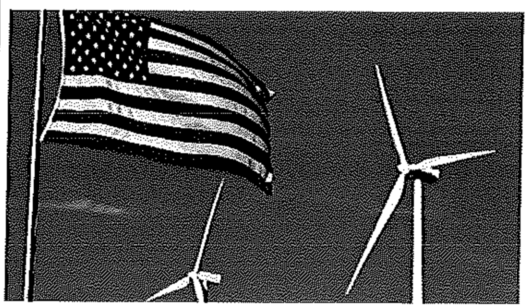
Southern Alliance for Clean Energy

DONATE

TAKE ACTION

Deadline July 13th:

Tell the Department of Energy to support the delivery of low-cost wind power to the Southeast!



The United States has some of the best renewable resources in the world, but we face a critical challenge. We lack the 21st century electric transmission infrastructure to deliver abundant sources of renewable energy, which are primarily located in remote areas, to our

http://www.cleanenergy.org/2015/07/01/tell-the-dept-of-energy-to-support-low-cost-wind-power/