

Plainsandeastern

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To: Plainsandeastern
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The Plains and Eastern Clean Line proposed HVDC project does not meet the following eligibility criteria.

i B) Necessary to accommodate an actual or projected increase in demand for electric transmission capacity.

The project does not meet an actual increase in demand. This is self evident in that Clean Line has been unable to secure contracts with utility companies at the eastern terminus of the proposed transmission line. There may be potential wind generation companies at the western starting point, but without utility customers there is no actual demand.

The project does not meet a projected increase in demand. The largest entity to study future demand for this project, the TVA, has repeatedly refused to enter into any agreement to purchase electricity supplied by the PECL transmission line. The TVA has done this despite massive lobbying efforts by Clean Line Energy Partners.

ii. The proposed Project must be consistent with
(B) Efficient and reliable operation of the transmission grid.

One of the many design flaws in the PECL proposal is a simple geographic reality. The proposed transmission line passes through the most tornado prone region of the Earth, central Oklahoma. While Arkansas does not typically experience as many tornados as Oklahoma, the state does have a history of numerous destructive tornados. This geographic reality means the PECL will not be a reliable source of electricity for any hypothetical, but currently nonexistent, utility clients at the eastern terminus. Let's examine Clean Line's entirely unsubstantiated claim that the company can quickly repair any tornado damage done to the PECL transmission line. This is a company of approximately 45 employees, only three of which are engineers. This company has NEVER constructed, operated, maintained, or repaired a single transmission line of any size. The claim that this company could QUICKLY repair a massive HVDC transmission line is absurd. Of course, given enough time, Clean Line could make arrangements with another company to repair the the line. In that case, the repairs would take weeks, possibly even months. During which time the hypothetical, but currently nonexistent, utility customers would be without the electricity theoretically provided by the transmission line. Reliable? Not to anyone objectively evaluating this proposed transmission line.

iii. The proposed Project will be operated in conformance with prudent utility practice.

Neither Clean Line Energy Partners nor any of it's various limited liability corporations is a utility company. It never has been and never will be a utility company. Clean Line has aspirations to become a merchant transmission company. Therefore, by definition, Clean Line will never be "operated in conformance with prudent utility practice".

Joel Dyer