

Christopher Lawrence
Management and Program Analyst
Transmission Permitting and Technical Assistance
Office of Electricity
US Department of Energy
By email to Christopher.Lawrence@hq.doe.gov

Re: Application to Rescind Presidential Permit; Application for Presidential Permit; Champlain Hudson Power Express, Inc. to CHPE. LLC

The Solidarity Committee of the Capital District (Solidarity Committee) joins with the North American Megadams Resistance Alliance (NAMRA) and others in opposition to the request from Champlain Hudson Power Express, Inc. (CHPEI) and CHPE, LLC to transfer the 2014 Presidential Permit from CHPEI to CHPE, LLC. The Solidarity Committee believes the CHPE project has never been in the public interest, and thus should not be constructed.

The April 6, 2020 application transfer the Presidential Permit contains considerable information that is clearly not correct. Before any action can be considered by the USDOE, new, updated, and accurate information and plans must be submitted by the applicant, and a new supplemental Environmental Impact Statement prepared.

The 2014 Presidential Permit (PP) was issued to TDI based on a CHPE route trajectory that was then outdated, and thus, the Presidential Permit was and remains invalid, and cannot be transferred. CHPE was originally proposed to enter the United States under water. In 2013, CHPEI changed the route to one where CHPE would enter the United States overland.

This is a major change but many other have been made over the past seven years. The projected CHPE route in Schenectady, Washington, and Rockland counties have also been changed.

The NYS Public Service Commission (PSC) had scheduled a (one) public hearing for March of this year concerning all the CHPE route changes. The hearing in Scotia (Schenectady County) was never held due to the Covid-19 pandemic. The Solidarity Committee has written to the PSC saying that before any further PSC regulatory action on CHPE can be undertaken, public hearings must be scheduled and held in all the counties in which CHPE route changes have been made. The PSC has so far not responded to this request.

In addition to the route changes, other CHPE project changes have occurred. The CHPE high-voltage direct current project was initially to be a 1000 megawatt (MW) one-way south transmission corridor. In recent years, CHPEI has increased the route capacity to 1250 MW and also proposed that CHPE be bi-directional.

Another important change is that Hudson Riverkeeper, formerly a supporter of CHPE, withdrew its support last year on November 18, and now opposes CHPE. Hudson Riverkeeper had entered into a written legal agreement with the PSC in 2013 regarding CHPE. This agreement is no longer valid.

The conditional permit from the U.S. Army Corps of Engineers (USACE) that is part of the PP required that CHPE construction be completed prior to the year 2020. The conditional permit has been extended until 2025, possibly without proper public notification.

The Solidarity Committee has opposed the Champlain Hudson Power Express electricity transmission corridor project since it was first proposed in 2010. The Solidarity Committee spoke in opposition to CHPE at US Department of Energy CHPE hearings on July 14, 2010 and November 19, 2013. The Solidarity Committee has often published anti-CHPE articles in our monthly newsletter--Solidarity Notes--most recently in the December, 2019 and January, 2020 issues.

For nearly thirty years, the Solidarity Committee has opposed additional Canadian electricity exports to the United States for many reasons. These include a desire to prevent rivers in Canada from being needlessly poisoned and destroyed, protect the health of Canadians including indigenous peoples, keep the wealth of New York circulating within New York rather than unnecessarily exported, and because CHPE would provide very few jobs here in NYS.

At present, Hydro Quebec, which would supply electricity for CHPE, is destroying the Romaine River, transforming it into power stations, dams, and reservoirs. The Solidarity Committee believes that Hydro Quebec strongly supports CHPE, and Hydro Quebec participates in considerable lobbying and promotion of Quebec electricity sales here in New York State.

Investing the same amount of money as CHPE would cost to construct (more than \$3 billion) on appropriately sited, in-state conservation, energy efficiency, and renewable energy would generate probably 100 times more good-paying, union jobs than the few dozen CHPE would.

Solidarity Committee members participated in the Save James Bay network from 1990-1994 that led to the cancellation of the proposed Great Whale River project in Quebec. Solidarity Committee members worked with Cree Indians from Quebec in their efforts to preserve their homeland far to the north of Montreal.

The Solidarity Committee was formed in 1983 to advance the aspirations of working and retired people for labor union affiliation, peace, justice, and other goals envisioned by the Rev. Martin Luther King, Jr.

Tom Ellis
Solidarity Committee of the Capital District
[43 North Pine Avenue](#)
[Albany, NY. 12203](#)