

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

Southwest Power Pool, Inc.

)

Docket No. ER10-1269-000

**MOTION TO INTERVNE AND COMMENTS OF
CLEAN LINE ENERGY PARTNERS LLC**

This Motion to Intervene and Comments are filed pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212 and 385.214 (2009), and the Notice issued on May 19, 2010.

I.

Correspondence or communications with respect to this pleading should be addressed to the following:

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II.

Clean Line is an independent developer of high voltage, long-haul transmission lines. Clean Line focuses exclusively on connecting the best renewable energy resources in North America with robust electricity demand centers through the use of high voltage, direct current (“HVDC”) transmission. Clean Line provides transmission solutions to generators and load-serving utilities to efficiently interconnect clean energy with consumers and has projects under development that will be located in Southwest Power Pool, Inc. (“SPP”).

As the United States moves to achieve its ambitious renewable energy goals, a dramatic expansion of the transmission grid is by far the most efficient way to incorporate renewable resources. Clean Line will play an instrumental role in accelerating the delivery of renewable energy from remote resource areas to distant load centers and in achieving United States environmental policy goals. The need for lines like those that Clean Line is developing will continue to grow as electricity demand increases in the United States and as the demand for clean power sources accelerates. Technology improvements in wind and transmission make the efficient transportation of wind energy more feasible now than ever before.

Clean Line is backed by leading investors who share the vision that independent transmission developers can and should contribute to the development of our electric grid. Clean Line's backers include the Houston-based Zilkha family and ZAM Ventures, L.P., the principal investment vehicle for ZBI Ventures, L.L.C ("ZBIV"). ZBIV, which focuses on long-term investments in the energy sector, is a subsidiary of Ziff Brothers Investments, L.L.C. The Zilkha family was the original owner of Horizon Wind, now the third largest wind generation company in the United States. Both of these investors, as well as the Clean Line management team, have a track record of successfully developing major energy projects. Clean Line has both the funding and the expertise to move forward with the financing and development of a major electric transmission project.

Clean Line is developing several high voltage, direct current transmission lines that will export wind and solar energy from some of America's best resources to load centers and customers in regions without abundant indigenous renewable energy resources. Clean Line has already made significant progress on transmission projects in western Oklahoma and the surrounding region as well as the upper Midwest – all within or near the SPP region. Clean Line

is developing the Plains and Eastern Clean Line to deliver wind and solar generated electricity to be produced in southwestern Kansas, northwestern Oklahoma and the Texas panhandle to the Tennessee Valley Authority and other areas of the southeastern United States. The Plains and Eastern Clean Line will consist of two parallel circuit ± 500 or ± 600 kilovolt direct current overhead transmission lines and is scheduled to deliver up to 7000 MW of associated energy to the TVA network and surrounding areas beginning in late 2015.

In the upper Midwest, Clean Line is actively developing the Rock Island Clean Line, a high-voltage, direct current transmission line that will connect 3500 MW of wind in Iowa and South Dakota or Nebraska (within the SPP region) with load centers near Chicago and the surrounding region. Although wind energy in Iowa, Minnesota and the Dakotas has grown impressively in recent years, the construction of new projects will grind to a halt if additional transmission lines are not built soon. The Rock Island Clean Line will alleviate this deficiency.

III.

On May 17, 2010, Southwest Power Pool, Inc. (“SPP”) filed proposed revisions to its Open Access Transmission Tariff (“Tariff”) to incorporate a modified transmission planning process, the Integrated Transmission Plan (“ITP”), that SPP will use to determine its near- and long-term transmission needs to maintain reliability and provide economic benefits throughout its footprint. Clean Line.

IV. Comments

Clean Line supports SPP’s proposal and requests that the Commission approve the proposed revisions to its Tariff, effective July 17, 2010, as requested by SPP. As designed, SPP’s ITP would allow it to determine in an efficient manner the transmission facilities necessary both to maintain reliability and provide economic benefits to the SPP region in the near- and long-term.

Fundamentally, such transmission facilities would serve to enhance the overall reliability of the regional grid. In addition, such transmission facilities could be developed to lower electricity costs to consumers. Importantly, transmission could also be developed to bring other economic benefits to the region, through, for example, the export of wind generation to other regions.

The United States is home to vast quantities of clean, renewable energy resources but, as several recent studies have pointed out,¹ significant transmission is necessary to continue development of this vast resource. This transmission must be planned in a prudent and efficient manner. SPP's ITP will do just this and will enhance the SPP Regional grid, by proactively looking at both short-term and long-term transmission needs. In the previously cited studies, HVDC infrastructure is the preferred method to deliver carbon-free electricity to consumers remote from the resource areas; however, this HVDC infrastructure will only work, as borne out in these studies, if it is paired with good regional planning activities as is proposed by SPP in this proceeding.

In addition to existing state renewable portfolio standards and mandates, the current and previous administrations have called upon the renewable sector to help assure the nation's energy security. Consistent with that objective, the ITP would allow SPP to determine the transmission facilities that are necessary to enhance the nation's energy security both from a reliability perspective as well as an economic perspective. The facilities as proposed by Clean Line would be a strong complement to the robust regional planning as proposed by the SPP ITP and help to ensure the nation's energy security by providing access across regions to renewable resources that would otherwise be untapped.

¹ *Eastern Wind Integration and Transmission Study*, prepared for The National Renewable Energy Laboratory by EnerNex Corporation, January, 2010, http://www.nrel.gov/wind/systemsintegration/pdfs/2010/ewits_final_report.pdf. *Joint Coordination System Plan*, http://www.midwestmarket.org/publish/Document/20b78d_11ef44fc9c0_-7c6d0a48324a/JCSP08-Executive_Summary.pdf?action=download&_property=Attachment

Compared with the costs of building wind generation facilities in less windy areas, building transmission to connect these wind-rich resource areas to distant load centers is significantly less. The ITP planning process would facilitate this by allowing SPP to determine the transmission facilities needed in the near- and long-term.

V.

As a developer of transmission in SPP, Clean Line has a direct and material economic and legal interest in this proceeding that cannot be adequately represented by another party. Accordingly, Clean Line's intervention is in the public interest.

VI. Conclusion

Transmission is required to ensure long-term energy security and is the most cost effective way to incorporate renewable resources into the grid. Robust regional planning efforts like that proposed by SPP will be the foundation of that infrastructure. These regional plans are the most efficient way to capture the resources in the richest areas. Projects such as those proposed by Clean Line will fully complement the regional plans and help achieve a secure energy future. We urge the Commission to adopt the ITP proposal as requested by SPP.

WHEREFORE, for the reasons set forth above, Clean Line respectfully requests that the Commission permit it to intervene in the proceeding and be made a party for all purposes.

Respectfully submitted,

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