



June 10, 2011

The Honorable Dr. Steven Chu, Secretary of Energy
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585
The.Secretary@hq.doe.gov

Dear Secretary Chu:

The country's aging transmission grid is insufficiently prepared to support the national investment required to repower America with clean renewable energy. The existing transmission system was primarily built as a result of local utility planning – connecting population centers with nearby fossil fuel power plants. Today, transmission is needed to access the best wind and solar resources as they are far away from load centers. New long-haul transmission lines must be built to fully support the potential of America's vast renewable resources and further the development of the clean energy economy. And this needs to happen now.

The President recognized this early in this administration when he mentioned the need for new transmission capacity to usher in the clean energy economy:

“The state of the economy calls for action, bold and swift, and we will act – not only to create new jobs, but to lay a new foundation for growth. We will build the roads and bridges, the electric grids and digital lines that feed our commerce and bind us together. We will restore science to its rightful place, and wield technology's wonders to raise health care's quality and lower its cost. We will harness the sun and the winds and the soil to fuel our cars and run our factories.”¹

Our organizations have promoted the need for states to work together on transmission planning efforts, especially to integrate renewable energy resources. This coordination is coming together in the western United States, while interconnection-wide coordination in the east lags behind. While efforts are underway to enhance planning for renewable resource integration in across the U.S., we believe that DOE should utilize the full range of its existing authorities to promote responsibly-sited transmission for renewable energy resources if we are to meet the President's call for action. This challenge was made even more urgent by the release of the National Research Council report “America's Climate Choices,” released last month, which underscored the increasing threat climate change poses public health, our environment and our economy.

¹ Inaugural Address, January 20, 2009.

The Department of Energy has existing authorities that it can use to help meet the President's goals by ensuring that needed new transmission can be financed and built expeditiously. The Department should consider using these authorities to advance needed new lines that primarily service new renewable energy generation and are sited in a manner that protects our wildlife and wild lands.

Among these, DOE issued a request for proposals in June of 2010, seeking partnerships under Section 1222 of the Energy Policy Act of 2005 to develop transmission lines that will promote new renewable energy facilities. Executing partnerships such as those contemplated under the 1222 RFP would allow the NEPA process to begin, generating meaningful public engagement and analysis of environmental impacts. Notably, this partnership will not require any federal expenditure. DOE received two responses in 2010 and has not taken further action.

We do not believe that these authorities, including section 1222, are appropriate in all circumstances, however. We do not support the use of this authority to facilitate further expansion of conventional thermal power plants. In addition to our concerns about worsening carbon dioxide and criteria pollution, conventional resources do not need this authority. Incumbent utilities can develop transmission for these plants already, without exercising additional federal authority, while they have little incentive to construct lines for remotely constrained renewable resources. As we have seen in this case, the application of this authority may make the difference between opening a promising renewable energy resource area capable of providing renewable power to an otherwise underserved part of the country and preventing that development from occurring.

We encourage DOE to exercise its existing authorities under Federal law, including section 1222.

Sincerely,



Carl Zichella
Director of Western Transmission
NRDC



Chase Huntley
Director, Renewable Energy Policy
The Wilderness Society