Comment Letter E90

Energy - Docket Optical System

From: Mark Etherton <mark.etherton@powereng.com>
Sent: Monday, February 23, 2015 12:09 PM
To: Energy - Docket Optical System
Subject: DRECP NEPA CEQA Comments of Southwest Transmission Partners
Attachments: NGIV2 Project Proposed Corridor 050614.pdf

Comments submitted on behalf of Southwest Transmission Partners, LLC:

We appreciate the opportunity to provide comments related to the Desert Renewable Energy Conservation Plan ("DRECP") Draft EIS/EIR. Southwest Transmission Partners, LLC ("STP") is developing a new extra high voltage transmission facility primarily within the Imperial County region, known as the North Gila - Imperial Valley #2 Project ("NG-I V2 Project"). The NG-I V2 Project initiated permitting with the BLM in September 2009 with the submission of the respective SF-295, and was subsequently assigned case number CACA-51375. STP has an executed MOU and a fully executed and funded Cost Recovery Agreement in place with the BLM. A map showing the NG-I V2 Project proposed route, which is located primarily within Designated Utility Corridors, is attached to these comments. We expect to finalize alternatives in working with the BLM, county, tribal and other potential cooperating agencies to initiate the scoping process later in 2015 and finalize permitting by the end of 2017. The project is also actively participating in the regional transmission planning through the CAISO, WestConnect, and the WECC Three Phase Rating Process with an anticipated transmission capacity of a minimum of 1200MW (up to 2000MW depending on the configuration).

The 85 mile NG-I V2 Project is a major intertie expansion (single circuit or double circuit) between the existing substations in the Imperial Valley area (Imperial Valley Substation) and the Yuma county area (North Gila substation) in southwestern Arizona. It is proposed to parallel the existing North Gila-Imperial Valley line (also known as the Southwest Power Link, or SWPL) for most of its length, with an expected minimum separation of 250 feet from the existing SWPL to meet reliability criteria. The potential for a second circuit would be proposed to be constructed on the same set of structures, and would potentially loop in and out of the existing Highline substation along the Highline Canal owned and operated by the Imperial Irrigation District.

A primary purpose of the NG-I V2 Project is to promote additional renewable energy interconnections and deliver clean renewable energy to both California and Arizona customers. We understand that the primary purpose of the DRECP is to promote the expansion of renewable energy and the associated transmission facilities required to deliver throughout the region and supports the use of transmission corridors. Therefore, we believe the NG-I V2 Project should be included as one of the transmission lines incorporated into the DRECP analysis as it meets these primary DRECP objectives.

We appreciate the opportunity to submit our comments and look forward to providing any data needed for the inclusion of the NG-I V2 Project in the DRECP analysis.

Thank you again and please give me a call if further clarifications or questions are needed related to the NG-I V2 Project.

Please confirm receipt of these comments for our records.

Mark L. Etherton, P.E.
Project Manager on behalf of Southwest Transmission Partners, LLC
Cell: (602) 809-0707
Response to Comment Letter E90

Southwest Transmission Partners LLC  
Mark L. Etherton  
February 23, 2015

E90-1 Thank you for your comment describing your project. No change in the document is required as a result of this comment.

E90-2 Volume IV, Section IV.25.1.2 explains the rationale for projects included in the cumulative list. While your project has submitted an SF-299 form to the BLM, it does not fall within the category of projects determined to be foreseeable at this time for this project.

E90-3 No change in the document is required as a result of this comment.