Public Technical Conference DOE Congestion Study and Criteria Designation of National Interest Electric Transmission Corridors

March 29, 2006 Comments of Edward D. Tatum, Jr. Old Dominion Electric Cooperative

- Corridors need to be "just right"
- Too broad a designation could frustrate Congress' intent to facilitate licensing
- Identify specific facilities rather than a family of alternatives
 - Too many; too long
 - Recognize impact on existing facilities

- Existing infrastructure points with generalized paths between
 - Need "off ramps"
 - Opportunity to upgrade existing facilities or utilize existing ROW
 - Need to deliver into congested area
 - Provide States necessary opportunity for final specific line siting

Regional Plan

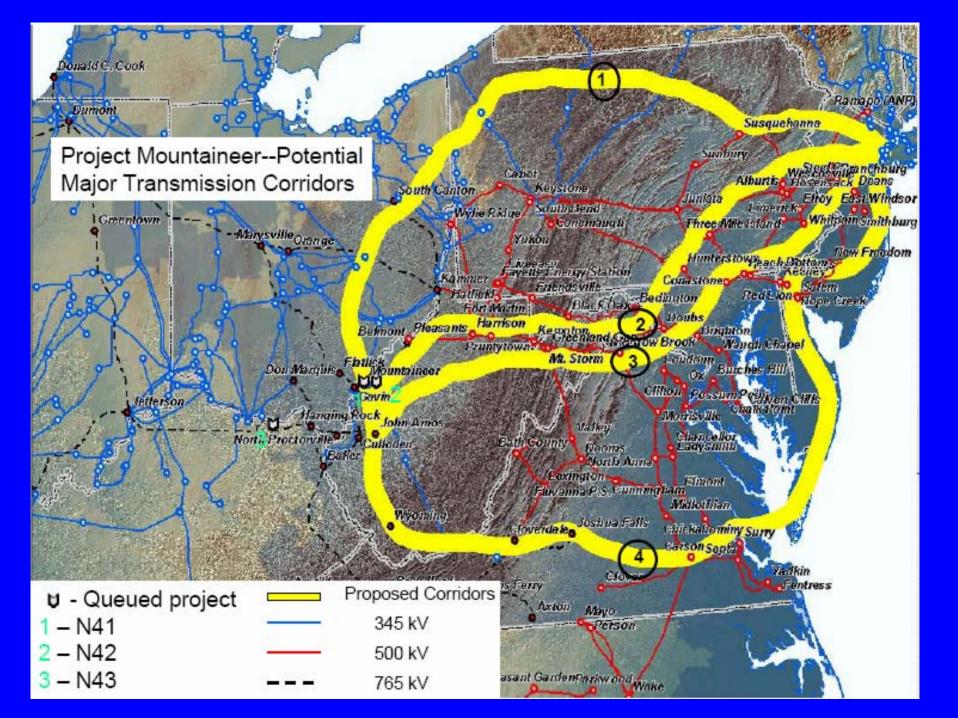
- Need to be the result of open, inclusive regional planning process (with predetermined criteria) to identify specific facilities and scope of corridor
- Facilitate investment by non-traditional utilities

Regional Plan

- Openness engenders buy in and facilitates solutions
- Assess delivery and export regions
 - Economics and reliability equally important
 - Chronic load pockets and specific LSEs

Regional Plan

- Include resource adequacy via deliverability of new and surplus baseload generation
- Assure viability of long-term transmission rights



Criteria

- 2&3: Assess long term power supply planning impacts as well as existing conditions; sufficient granularity for load pockets
- 4&5: Should consider but have less direct impact on corridor selection
- 7: Give more weight to proven and dependable technologies

Criteria

- Criteria 8: Part of any planning process
 - Not in Sec 216(a)(4)
 - Transmission is *not* a commodity capable of competing with generation and demand response
 - "Enabler"; a necessary regulated transportation system to facilitate a competitive wholesale market