From: corridoreiswebmaster@anl.gov

To: <u>Corridoreisarchives</u>;

CC:

Subject: Energy Corridor Programmatic EIS Comment 80056

Date: Monday, November 28, 2005 4:20:28 PM

Attachments: Redding_Corridor_Map_80056.pdf

Thank you for your comment, James Feider.

The comment tracking number that has been assigned to your comment is 80056. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 04:20:16PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80056

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Privacy Preference: Don't withhold name or address from public record Attachment: G:\Admin Files\Organizations\DOE\Redding Corridor Map.pdf

Comment Submitted:

INITIAL COMMENTS OF THE CITY OF REDDING, CALIFORNIA TO THE

U.S. DEPARTMENT OF ENERGY'S WEST-WIDE ENERGY CORRIDOR

PROGRAMMATIC ENVIRONMENTAL IMPACT STUDY

The City of Redding, California (Redding), is pleased to provide these initial comments to the United States Department of Energy (DOE) regarding the West Wide Energy Corridor Programmatic Environmental Impact Study (PEIS).

Redding owns and operates a municipal utility that serves all the electric needs of the City. Since 1921, Redding has provided electric service within its boundaries. For the fiscal year ended June 30, 2005, the City served an average of 41,342 customers, had total sales of 762,041 MWh and a peak demand of 228.4 MW. To provide electric service within its service area (which is coterminous with the City's corporate boundaries), Redding owns and operates an electric system which includes natural gasfired generation, transmission and distribution facilities. Redding also purchases power and transmission service from others in the Pacific Northwest and Desert Southwest. In addition, Redding provides other typical municipal services to its inhabitants such as police and fire protection and water and sewer services.

As a vital link in Redding's electric resource portfolio, over the last 20 years Redding has been very active in the development and procurement of high-voltage (230kV and 500kV) transmission. Redding is a member of the joint powers agency known as the Transmission Agency of Northern California (TANC). TANC is the largest Participant in, and the Project Manager of, the California-Oregon Transmission Project (COTP), a \$430 million, 339-mile, 500-kV transmission project extending from just north of the California-Oregon border to central California. As a TANC member, Redding has a 129 MW allocation of the COTP. The COTP, in conjunction with 230kV interconnection transmission service from the Western Area Power Administration, Sierra Nevada Region (Western), has provided Redding's citizens with long-term firm transmission access to lower cost power resources in the Pacific Northwest including 75MW of renewable power from wind resources located in the Columbia River basin in Washington State.

In addition, through TANC Redding has an allocation of 31 MW of firm bi-directional service from the Pacific Gas and Electric Company (PG&E) pursuant to the Principles for Tesla-Midway Transmission Service reflected in PG&E FERC Rate Schedule No. 143 (SOTP). Redding receives 31 MW of transmission service across California's Path 15 under the SOTP. As a member of TANC, Redding has jointly explored additional bulk transmission projects, including the recently completed Path 15 upgrade project.

As a member of yet another joint action agency known as M-S-R, Redding shares ownership-like interest in 500kV transmission lines across New Mexico, Arizona and into California that link Redding to its ownership-like interest in a coal-fired power plant located near Farmington, New Mexico. Through additional high-voltage transmission services from the Los Angeles Department of Water and Power and Southern California

Edison, Redding can deliver efficient, low cost coal power from New Mexico to its citizens in Redding, California.

As a medium sized municipal electric utility, Redding is too small to individually develop any of the large transmission projects that will be needed to support the reliable electric service for the western United States into the next decade. However, through joint action efforts, like that utilized by TANC and M-S-R to build the COTP and the southern transmission projects, such large projects can provide small and large utilities, public and private utilities, with decades of economic and reliability benefits for their customers. Therefore, Redding endorses and supports the comments provided to DOE by TANC with regard to a need to designate corridors for electric transmission facilities across federal lands.

Throughout California's deregulation problems, Redding remained a full service, vertically integrated utility. As such, Redding retained the responsibility to assure that sufficient reliable resources were ready and available to meet all the electric needs of the City. Such resource planning is now referred to as Resource Adequacy in the post-deregulation cleanup models. Utilities, like Redding, that are responsible for serving enduse load need to have firm, physical transmission rights to justify investments in large projects. Redding believes that firm physical transmission rights should be a cornerstone of any transmission project across federal land. Transmission lines will not be built if generation is not also developed to be delivered along the transmission facilities, and the generation facilities will not be developed without transmission facilities to deliver the firm electricity and customers to purchase the output from the generation plants.

In conjunction with TANC, Redding is currently in the preliminary phase of exploring several new joint transmission projects that we believe may be appropriate for DOE to consider right-of-way corridors to assist in the development of the projects. Of particular interest to Redding is a new transmission path from Northern California to Northeastern Nevada and potentially beyond. Attached is a regional diagram borrowed from the Western Regional Corridor Study of 1986 where the specific corridor previously mentioned is highlighted in yellow (see attachment). More detailed corridor maps from the 1986 study are available and we would be glad to provide electronic versions to DOE if that would be helpful.

Finally, Redding believes that coordinated participation by the federal government is critical to successful development of transmission projects in the West. In coordination with TANC, Redding would like to participate in further discussions on our proposed projects and how we may be able to assist DOE in your current efforts. Thank you for the opportunity to provide comments on this important issue facing our country.

Questions about submitting comments over the Web? Contact us at: corridoreiswebmaster@anl.gov or call the Energy Corridor Programmatic EIS Webmaster at (630)252-6182.

