

**Appalachian Mountain Club • Biodiversity Conservation Alliance • Center for Native Ecosystems
Earthjustice • Energy Conservation Council of Pennsylvania • Environmental Defense Fund
League of Conservation Voters • National Audubon Society • National Parks Conservation Association
National Wildlife Federation • Natural Resources Defense Council • Nevada Conservation League
Nevada Wilderness Project • Oregon Natural Desert Association • Pennsylvania Land Trust Association
Piedmont Environmental Council • San Luis Valley Ecosystem Council • Sierra Club
Southern Alliance for Clean Energy • Southern Environmental Law Center
Southern Utah Wilderness Alliance • Southwest Environmental Center • Union of Concerned Scientists
Western Resource Advocates • Western Environmental Law Center • The Wilderness Society**

March 11, 2009

Carol Browner
Assistant to the President for Energy and Climate Change
Executive Office of the President
Washington, DC

Dear Ms. Browner:

We support significant reforms in how electrical transmission lines in this country are planned, sited, built, and managed as part of a comprehensive effort to transition to a clean energy economy. The centerpiece of a national strategy must be an economy-wide cap on global warming pollution that results in rapid and dramatic emissions reductions. Additional, complementary measures must also be undertaken that promote deployment of renewable energy resources, energy efficiency measures, and environmentally-beneficial demand response policies. Meeting our country's energy needs with clean renewable energy will require significant investments that must be undertaken immediately, but these investments must not exacerbate global warming emissions or air pollution that harms human health and ecosystems.

In this context, we believe it imperative that legislation reforming federal electric transmission policy contain the following elements:

Coherence with Clean Energy Priorities

Transmission policy reform must result in new lines that serve clean renewable resources, rather than expanding the carbon-intensive power generation that currently accounts for more than 40 percent of U.S. greenhouse gas emissions and contributes to the continued deterioration of air quality in the country's most vulnerable communities. Piecemeal energy policy—especially electric transmission policy reform—in advance of a comprehensive national climate regime can have the real but unintended effect of facilitating *more*, not less, greenhouse gas pollution. For example, recent projects proposed in Pennsylvania and Virginia billed as renewable lines would ultimately result in significant new or expanded remote coal generation. To ensure that new transmission moves the nation toward a clean renewable energy future, robust safeguards must be put in place to ensure that new lines are designed, sited, built, and operated to serve clean renewable

electric generation while taking into account the considerable contributions that distributed generation, untapped energy efficiency and demand response can make for reducing the need for new facilities.

Comprehensive Super-Regional Planning

Resource planning for the western and eastern interconnections is crucial to an economically and environmentally sound electric grid. The planning processes for our national grid must be fair, unbiased, science-based, broadly participatory, and transparent. In designing these processes, the traditional role of states, regional authorities and the federal government must be reappraised. Transmission is only one piece of our clean energy future; energy efficiency, demand response, energy storage, and distributed generation technologies are all resources that must be considered along with traditional central power stations that require interstate transmission. These alternative resources must be evaluated as part of a region-wide integrated resource plan, evaluated and weighed equally with new generation in making a determination of need. New transmission lines should only be built if they are truly needed, and demand for low-carbon generation cannot be satisfied otherwise. In particular, broad deployment of small-scale renewable and low carbon distributed generation is a critical component to reducing carbon emissions, as it decreases the need for expensive new transmission lines by facilitating energy production and consumption in the same location and reduce line loadings on existing facilities.

Environmentally Responsible Siting

Some of the richest renewable energy resources are far from major population centers. Under the current transmission planning process, some state and regional siting decisions have missed opportunities to cooperatively identify zones and corridors for development of renewable resources that protect unique and sensitive natural systems, wildlife habitats, and cultural resources, as well as national park units and other protected public lands. Future transmission siting must use the best practices developed via processes such as California's Renewable Energy Transmission Initiative and similar protocols. These efforts apply screening criteria to prioritize areas for development based on their suitability, and ensure that critical habitat, environmentally and culturally sensitive lands, or protected areas are excluded. Such an approach benefits all parties by clearly delineating which areas of most potential for renewable energy generation and transmission have the least conflicts, and are therefore less likely to result in conflict or litigation, an outcome that all parties would prefer to avoid. It is also imperative that the social and ecological impacts of transmission lines be assessed in full compliance with our nation's environmental laws—including the National Environmental Policy Act—and must provide the public with ample opportunities for meaningful involvement. Regional, state, and federal wildlife, lands, and resource agencies must be full partners in future transmission planning processes.

Smarter Use of Existing Infrastructure

Before building any new transmission, we need to make every effort to improve efficiency to negate the need for new supply, and also to better utilize existing transmission infrastructure. With this in mind, we believe foremost that the nation needs to pass additional energy conservation measures and implement more efficient technologies at all levels of supply, delivery, and end-use. Future energy demand cannot be met without ambitious efficiency gains in our buildings, appliances, industries, and transportation. We need to provide incentives for deployment of energy storage and innovative smart grid technologies. Much cost-effective and carbon-free demand reduction and conservation potential remains untapped in these areas. We must also be

sure to maximize the use of the existing power grid by way of voltage and service upgrades and by making use of existing transmission infrastructure and other rights-of-way including existing pipelines, roads, and rails. Damages to private and public values from development of existing and new rights of way should be minimized and appropriately addressed.

With these principles in mind, we fully support and promote the deployment of clean, renewable energy across the nation and the new transmission infrastructure that will be necessary for much of that power to access electricity markets. However, although new transmission is an important and perhaps imperative option, it must be carried out properly in order to ensure that we do not overlook other superior energy opportunities, sacrifice our nation's precious lands and wildlife, or undermine critical efforts to rid the nation of dangerous dirty air and global warming pollution.

Thank you for your time, and we look forward to discussing these ideas with you further.

Sincerely,

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Western Resource Advocates
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CC: Hon. Nancy Sutley, Chair, Council on Environmental Quality
Hon. Ken Salazar, Secretary, Department of the Interior
Hon. Steven Chu, Secretary, Department of Energy
Senate Majority Leader Harry Reid
Senator Jeff Bingaman, Chair, Committee on Energy and Natural Resources
Senator Maria Cantwell, Chair, Subcommittee on Energy
Speaker of the House Nancy Pelosi
Representative Henry Waxman, Chair, Committee on Energy and Commerce
Representative Edward Markey, Chair, Subcommittee on Energy and Environment