

4 Responses to Comments

PH Comments made via telephone

LTR Comments made via letters to Bonneville

Comments were designated with an identifying number based on the order in which the letter, e-mail, or other item of correspondence, etc. was received. The letters, e-mails, phone call logs, and meeting summaries that contain comments are copied in whole in Chapter 5 of this abbreviated final EIS.

A number of letters and e-mails regarding the Furman Ranch were received after the comment period. Bonneville was not able to provide written responses to the comments in these letters due to the public comment period timing, but many of the letters are copied in Chapter 5 and the comments will be taken into consideration in the decision-making process.

Purpose & Need (Chapter 1)

Need for Action

Comment: *What will the capacity of the line be? [HCC]*

Response: The proposed new transmission line conductor would be a triple bundle Deschutes; at 100 degrees C, it would be rated at 4,560 amps. Depending on the operational variables, the line would have a capacity between 1,400 and 2,300 MW.

Comment: *How much will Newport use? [HCC]*

Response: A long-term, point-to-point Transmission Service Agreement would be negotiated between Bonneville and Newport Northwest, LLC for the Wallula Power Project. Wallula's proposed reserve capacity would be for about 50% of the capacity of the line.

Comment: *Last guy on the system is the first one off if generation exceeds capacity of line. [HCC]*

Response: Each Transmission Service Agreement is different. If generation exceeds capacity, the generation that would be taken off the line would depend on the written agreement (firm, non-firm, etc.).

Comment: *Is the construction of this line contingent on signing up enough customers? [PS]*

Response: Yes. If the customers requesting firm transmission service do not sign contracts, there would not be a need to increase the capacity of the transmission system in this area.

Comment: *On the existing generating projects, redundancy and transfer capabilities already built into the system. [RS]*

Response: Yes, that is correct.

Comment: *What will make California short on power again? [RS]*

Response: There were a number of issues and situations, which resulted in the California power shortage last summer. The state has since implemented a variety of corrective actions, which it hopes will alleviate any future power shortages.

Comment: *How long will this line carry it before needing another? [RS]*

Response: The proposed line would have a capacity of 1,400 to 2,300 MW. If the power flow through the area exceeds the capability of the lines in the area, a new line or other facility improvement would be needed. It is uncertain at this time if and when another new line would be needed.

Comment: *The EIS states that Bonneville is facing two problems regarding power flow on the Federal Columbia River Transmission System (FCRTS): there is not enough electricity being generated to meet demand, and many of Bonneville's transmission lines are now at capacity and cannot carry more power. The draft EIS issued by the Federal Energy Regulatory Commission for the proposed Irene Creek and Anderson Creek Hydroelectric Projects in the Skagit River Basin states that "although energy shortfalls occurred in the Western Systems Coordinating Council [WSCC] region in 2000-2001, reserve capability as a percent of firm peak summer demand is projected to increase from 22.4 percent in 2001 to 46.7 percent in 2008, and falling to 36.8 by 2010." This statement is consistent with the slowing influx and the slowing economy in the west coast cities of Seattle and Portland... [LTR 008]*

Response: The two power flow problems identified in the draft EIS are intended to provide an overview of power planning issues facing the region now and in the future. However, the action proposed by Bonneville in the draft EIS is intended only to respond to the problem of insufficient transmission capacity and reliability, not the problem of insufficient electricity generation. As discussed in the draft EIS, private generation developers are addressing the problem of insufficient electricity generation.

The information from the FERC draft Supplemental EIS for the Irene Creek and Anderson Creek Hydroelectric Projects that is cited by the commenter is noted. As discussed above, Bonneville's proposed action is being proposed to respond to the need

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for more transmission capacity, not the need for more power. Because the reserve capability projections discussed in FERC's EIS concerns power capability, not transmission system capacity, these projections are not directly relevant to the need for Bonneville's proposed action. If anything, this information illustrates that power capability is expected to grow (as shown by the amount of power reserve growth outstripping power demand growth), thus further pointing out the need for Bonneville to construct additional transmission capability in the region to adequately and reliably transmit this additional power to areas of power demand.

It is worth noting that the projections in FERC's EIS are for the entire WSCC (now the Western Electricity Coordinating Council (WECC)) region, which includes 14 western states and British Columbia, Canada. For Bonneville's more geographically limited service area, Bonneville is still projecting a need for more power in the future, as discussed on page 1-2 of the draft EIS. This expectation is supported by Bonneville's latest energy projections, which conclude that the Pacific Northwest region faces a firm energy deficit of approximately 7,125 average megawatts (aMW) by 2011 if no new resources are developed. *Pacific Northwest Loads and Resources Study* ("White Book"), Bonneville 2002. Even if the projections in FERC's EIS held true for the Pacific Northwest, these projections assume the development of the proposed generation in the region and do not forecast the deficit conditions that would exist without this development.

Finally, while the region is currently in a period of arguably slow growth, Bonneville must make decisions based on long-term projections. As has been frequently demonstrated in the Pacific Northwest and other parts of the U.S., economies go through alternating cycles of growth and recession. For example, the sustained period of growth in the 1990s has been followed by a relatively short-term period of recession in the early 2000s. In the Pacific Northwest, the overall, long-term trend is one of growth, which is expected to continue into the foreseeable future. Basing decisions on short-term slow growth periods does not correspond appropriately to the more frequently occurring periods when the regional economy is growing and the demand for electricity increases. Planning and developing a transmission system at such a late stage is not feasible as it takes several years to get such a system in service. Therefore, Bonneville does not believe it would be wise to rely on the present slow down in the economy as a significant factor in fully assessing future demand.

Comment: *The EIS should include power need projections that demonstrate that building the proposed transmission line is needed to ensure power reliability. [LTR 008]*

Response: Power need projections for the region are provided on page 1-2 of the draft EIS and in the preceding response to the comment requesting information on Bonneville's most recent power deficit projections. Because the proposed transmission line is being proposed to address the need for additional transmission capacity and not

because of the regional power deficit problem, power need projections are not directly relevant to an assessment of the need for the proposed action.

Comment: *The statement that many of Bonneville’s transmission lines are now at capacity does not indicate that a transmission line, specifically the one between the McNary and John Day dam facilities is needed. [LTR 008]*

Response: As discussed on pages 1-1 to 1-3 of the draft EIS, there are several reasons that additional transmission capacity between the McNary and John Day Substations is needed. First, the transmission lines specifically in this transmission corridor are currently at or near capacity; therefore, Bonneville needs to provide additional capacity along this corridor to help relieve this congestion and ensure system reliability consistent with its statutory obligations. Second, Bonneville believes that the improvements now needed for this corridor are beyond the system “patches”—substation upgrades, conservation, and other non-wire solutions—that Bonneville has used over the last decade to remedy system constraints and congestion.

Third, and perhaps most important, additional transmission capacity is needed in this corridor due to requests from new generation developers in southeast Washington and northeast Oregon to interconnect to Bonneville’s system and acquire firm transmission service. When a developer requests firm-transmission service, Bonneville’s system planners run studies to determine if the system can handle the new generation flowing on the system. These studies include System Impact Studies and System Facility Studies. Based on these technical studies, Bonneville can determine where there may be system failures, bottlenecks, or equipment rating exceedances. The studies conducted by Bonneville for the new power development in southeast Washington and northeast Oregon, which have been incorporated by reference, show that this development requires the construction of the proposed line to adequately and reliability transmit the power to areas of high power demand on the west side of the Cascades.

Comment: *The purpose and need statement in the EIS should explain “why here” and “why now.” ...This question is especially relevant because Bonneville is concurrently proposing the construction of multiple transmission lines without explaining how the individual projects would address the larger need. This information should be included in the EIS. [LTR 008]*

Response: By providing information on the existing and projected transmission constraints, specifically in the corridor between the McNary and John Day Substations, Bonneville believes that Chapter 1 of the draft EIS adequately explains why the proposed action is needed now and in its proposed location. While the need to improve the transmission system throughout the region could be viewed as a generalized need, each individual transmission project that is proposed has its own independent need and responds to transmission problems and issues specific to its proposed location.

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Comment: *Page 1-1 states that presently, Bonneville is facing two problems regarding power flow on the system: there is not enough electricity being generated to meet demand, and many of Bonneville's transmission lines are now at capacity and cannot carry more power. The EIS should discuss how the demand for electricity generation and transmission is determined. [LTR 008]*

Response: The demand for electricity generation (resources) is determined by the market, meaning the amount of electricity demanded by Bonneville's customers. When determining projected resource demand, Bonneville makes reasonable forecasts of future load conditions based on numerous assumptions and projections, as described in Bonneville's latest White Book. (BPA 2002.) For transmission capacity, the ability of Bonneville's lines to adequately and reliably serve existing and projected transmission demand is analyzed through the technical studies described in the previous response to comments. Through these studies, Bonneville can determine whether the transmission system can accommodate the new transmission request in addition to all its existing contractual obligations, while maintaining system reliability.

Comment: *Page 1-1 states that southeast Washington and northeast Oregon is a prime area for power generation because of sufficiency of wind or access to gas pipelines, as well as access to high voltage transmission lines. The EIS should describe how providing additional transmission infrastructure in the area could make the area additionally attractive for even more power generation and the cumulative impacts of concentrated transmission in this area. [LTR 008]*

Response: As discussed on page 1-2 of the draft EIS, the proposed transmission line is needed to adequately and reliably transmit power from two large-scale generation projects in the general vicinity that have been proposed by private developers and would be expected to interconnect with Bonneville's transmission system. If these proposed generation projects are not developed, other proposed generation projects would be expected to use the transmission capacity of the proposed transmission line. The cumulative impact of all of the reasonably foreseeable generation projects in the project vicinity are discussed in the Cumulative Impacts section of Chapter 3 in the draft EIS. Because Bonneville reasonably expects that some combination of these various proposed generation projects would be built and would fully utilize the capacity of the proposed transmission line, the proposed action is not expected to make the area additionally attractive for other generation projects not already discussed in the draft EIS.

Comment: *Page 1-1 states that Bonneville has a statutory obligation to ensure that there is sufficient capacity and reliability in Bonneville's transmission line. The EIS should define sufficient capacity and reliability, state existing capacity and reliability levels, and identify the difference between the required capacity and reliability levels and existing levels. [LTR 008]*

Response: As discussed on pages 1-1 and 1-2 of the draft EIS, Bonneville's statutory obligation to ensure sufficient transmission capacity and reliability arises primarily from the Federal Columbia River Transmission Act (16 U.S.C. §§ 838-838k). Because this Act does not specifically define what constitutes sufficient capacity and reliability, Bonneville applies its own reasonable definitions of these terms, based on common usage and industry standards.

Concerning capacity, the capacity of the transmission system or a line is the amount of electricity it can carry. The capacity of a line varies depending on the voltage capacity of the conductor, the strength of the conductor and towers, the design of the lines, weather conditions, etc. Capacity is sufficient if a line can carry the electricity that needs to flow through the line. As discussed on page 1-1 of the draft EIS, the existing transmission lines between the McNary and John Day Substations are being fully utilized at almost all times, and are not capable of providing additional firm transmission service. While the existing lines may have capacity to carry additional power at low use times of day or year, they do not have the capacity to carry additional power during the times when this additional power is actually needed or generated. The proposed transmission line would be capable of carrying 1,400 to 2,300 MW and would have sufficient capacity to carry the additional power proposed to be generated in the region.

Reliability and capacity are interrelated. If a line exceeds its capacity, its reliability is compromised (lines sag below safety clearances, system components can fail). Reliability/capacity criteria are established through numerous standards (National Electric Safety Code, Western Electricity Coordination Council, Bonneville Reliability Criteria). These criteria also take into account scheduled and unscheduled outages of system facilities, as well as the ability for the system to withstand sudden disturbances, such as electric short circuits or unanticipated loss of system facilities. When interconnection of the new generation proposed in the region to Bonneville's existing lines is factored in, the capacity (hence reliability) ratings of these lines would be exceeded. Construction of the proposed line would ensure sufficient transmission capacity and reliability.

Comment: *The EIS should list power projects scheduled to go on line, the power each proposed plant would develop, the chance that each proposal would go on line, and projections of the total power produced versus projected need for power. [LTR 008]*

Response: Pages 1-5 through 1-7 of the draft EIS list the proposed power projects in the area and the power each plant is proposing to produce. Given the volatility of the market, it would be speculative to try and predict which proposal would be fully developed. Since the draft EIS was released, the Starbuck Power Project was put on hold and the Mercer Ranch project was cancelled. As described in the draft EIS, the proposed transmission line would have a capacity of 1,400 to 2,300 MW. This line would not be able to carry all the power proposed to be generated in the area. If some plants fail to be built, others would be able to utilize the line.

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The need for power was discussed in Chapter 1 of the draft EIS and is also addressed in other responses to comments on this subject.

Comment: *The draft EIS begins by describing Bonneville's responsibility for purchasing, developing, marketing, and transmitting electrical power to utility, industrial, and other customers in the Pacific Northwest. We believe that the EIS requires additional supporting information indicating 1) if the need for additional power in the Pacific Northwest exists now and would be needed in the future, and 2) if so, to what extent would power transmitted via the proposed line serve Pacific Northwest customers versus customers outside the Region. [LTR 008]*

Response: The information in the draft EIS sufficiently describes the regional need for power (see the previous responses to comments). Regarding who would be served by power generated in southeast Washington and northeast Oregon and transmitted via the proposed transmission line, this information is not necessary for determining the need for the proposed action or assessing its potential environmental impacts. However, the following information is provided.

The proposed transmission line would transmit power generated in southeast Washington and northeast Oregon to the west side of the Cascades. From there, it is impossible to determine who precisely is served by this power because it would become just an indistinguishable part of the general pool of electricity flowing on the transmission system once it is in the system. This system would be able to carry the power to various Pacific Northwest customers, including the high demand areas of Portland and Seattle. This system could also carry power south to California or north to Canada. Precisely who is served with this power would depend on where demand occurs. Because there is projected increased demand in the Pacific Northwest, it is expected that much of the newly generated power transmitted by the proposed line would serve this demand. However, some power could also be used as part of the traditional exchange of power between the Pacific Northwest and California. Through this exchange, the Pacific Northwest transmits power to California in the summer when there is more need for power in California and less need for power in the Northwest. In the winter, when this need is reversed, California transmits power to the Pacific Northwest. However, the amount of power that would be transmitted through this exchange is difficult to accurately predict due to its variability. In addition, regional demand varies with changes in weather patterns, which have shown wide variations in the recent years with hotter summers throughout the Pacific Northwest and other regions (such as California) occurring simultaneously.

Decisions to be Supported by the EIS

Comment: *When will a decision be made on the project? [RS]*

Response: Bonneville plans to make a decision in early fall 2002. The decision will be recorded in a Record of Decision that will be published in the Federal Register and distributed to those on Bonneville's mailing list.

Comment: *Page 1-3 states that if the decision is to build a new transmission line, Bonneville would determine the exact locations of the towers and access roads and choose among the mitigation measures identified in the EIS. The site-specific elements of the project need to be defined in the EIS in order to analyze the effects of constructing and operating the specific transmission line being evaluated in the EIS. [LTR 008]*

Response: The specific elements of the proposed action are described in Chapter 2 (Proposed Action and Alternatives) of the draft EIS. These elements are described in sufficient detail to allow a reasonable and meaningful analysis of the potential environmental consequences of implementing the proposed action (see Chapter 3 of the draft EIS). This analysis involved identifying the corridor that would be used by the proposed action, collecting data for various resources within and adjacent to that corridor, and determining the potential acreage of permanent and temporary impacts from transmission line construction and operation (including from transmission towers and access roads) within that corridor, based on the specific elements of the proposed action. In addition, Bonneville intends to use as much of the existing road system as possible. These roads have been surveyed and impacts considered. The precise locations of transmission towers and new access roads or spur roads have not yet been identified to allow siting flexibility to avoid sensitive resources as they exist at the time the line is actually built. After Bonneville decides whether or not to proceed with the proposed action, it can commit the agency resources needed to complete the final design work required to identify the precise locations of these elements.

Public Involvement

Comment: *How far along are you in the project process? [PS]*

Response: The draft EIS has been released for public the comment. This final EIS publishes the comments received on the draft EIS, responds to those comments, and revises the final EIS based on the comments, as appropriate. After the final EIS is released to the public, there is a 30-day waiting period before a decision on the project is made. Bonneville hopes to release a Record of Decision on the project by October 1, 2002. If the decision is to construct the proposed line, construction could begin by late fall 2002.

Comment: *Looks like my comments from scoping were addressed in the EIS. [RS]*

Response: We are glad to hear that. Thank you for taking the time to comment.

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Comment: *Will there be another opportunity to comment, after this comment period?* [RS]

Response: There are no more official opportunities after the comment period on the draft EIS. However, if comments are received after the final EIS is released, Bonneville will consider those when making a decision on the project.

Other Projects

Comment: *Your map should also show the existing generation facilities, rather than just the proposed sites.* [RS]

Response: The map shows the proposed facilities because those are the facilities that would add new power to the system thereby creating the need to increase the capacity of Bonneville's system.

Comment: *Are you still doing an EIS on Starbuck?* [RS]

Response: The Starbuck Power Project has been put on hold since the McNary-John Day draft EIS was published. The draft EIS for the Starbuck Power Project has not been completed.

Comment: *Does this project impact the Mercer Ranch Project? What is the status?* [PS]

Response: The Mercer Ranch Project has been cancelled since the McNary-John Day draft EIS was published. The Mercer Ranch Project would have required a new substation adjacent to the proposed McNary-John Day transmission line. The proposed transmission line would probably have looped into that new substation.

Comment: *The purpose and need or alternatives sections should also include the rationale for limiting the scope of the project to the proposed transmission line between termini at the John Day and McNary substations versus extending it, possibly between the proposed Wallula power project and McNary substation since an additional line is proposed there.* [LTR 008]

Response: The proposed action has been proposed specifically to respond to the need to relieve existing and projected transmission congestion between the McNary and John Day Substations. While the proposed action would serve new generation projects such as the Wallula Power Project, the McNary Substation is a logical terminus for the proposed action. In addition, because the proposed action could serve a variety of power generation projects proposed in the region by private developers (see Chapter 1 of the draft EIS), the proposed action has independent utility from any one specific generation project, and thus merits its own individual analysis.