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Sent: Monday, August 22, 2011 11:06 AM Eastern Standard Time
To: Azar, Lauren
Cc: Jon Wellinghoff
Subject: Sec. 1221 Corridor Designation Delegation to FERC

I am writing to you today regarding the possible delegation to FERC of the DOE authority to designate National Interest Electricity Corridors ("NEITC") pursuant to Section 1221 of 2005 Energy Policy Act.

Conservation Law Foundation (CLF) is a strong believer that smart advance planning that lays careful groundwork through comprehensive and wide area reviews will ease the way for specific decision-making, including siting and permitting of facilities. Given the absolute need to build new zero emissions energy resources (like wind and solar generation and sophisticated demand side resources) and the infrastructure to support those resources (like transmissions and "smart grid" facilities) we strongly believe that this sort of advance planning tool needs to be rapidly, fully and completely utilized. The NEITC mechanism, while far from perfect, if integrated with other bulk electric system planning can serve this function.

FERC, given its strong movement towards a requirement of deep and thoughtful planning in all regions in (among other things) its recently issued Order 1000, is a logical candidate to designate NEITC across the nation, leveraging the System Planning processes mandated by its Orders as foundational documents in that designation process.

We are hopeful that FERC would pursue the designation process as an outgrowth of this large scale, stakeholder driven, regional and interregional planning, making use of NEPA tools like comprehensive needs assessments and Generic and Programmatic Environmental Impact Statements that publicly air and engage environmental issues before they become a trap that an individual project can become "hung up on." While this would be a different approach than FERC has taken in some NEPA reviews (regarding LNG terminals for example) it is an approach that is very consistent with the general approach that FERC is taking as it regulates and oversees planning for the wholesale electricity system.

I am available to discuss this, and any other matter of interest, and I thank you for your time

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