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September 8, 2011

The Honorable Steven Chu
Secretary
U.S. Department of Energy
1000 Independence Ave, SW, Forrestal Bldg.
Washington, DC 20585

Dear Secretary Chu:

Thank you for the opportunity to provide comments on a proposed additional delegation of authority from the Department of Energy to the Federal Energy Regulatory Commission under Section 1221 of the Energy Policy Act of 2005.

We would first like to commend you and the other involved federal agencies for making an effort to move forward on processes to facilitate the construction of new transmission. The states share your interest in seeing needed transmission built on reasonable time lines. We fully support you in these efforts.

We would also support the continued focus on executing the promising Rapid Response Teams for Transmission to improve federal agency permitting of transmission. In our opinion, this is the major permitting obstacle to transmission projects in the Western Interconnection. The Rapid Response Teams should advance coordination efforts between state and federal permitting agencies for the selected pilot projects. The Teams should also develop a factual inventory of the factors inhibiting timely permitting action.

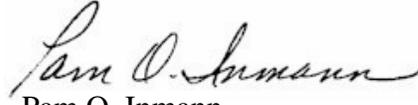
Before the Department of Energy moves ahead with any delegation of additional authority to FERC, WGA would request a meeting in the next few weeks between the states, DOE, FERC, DOI and the Department of Agriculture to discuss what the major transmission issues are and what the best approach to addressing them would be. We would also like to discuss a number of questions that surround any potential delegation of authority to FERC such as:

- How preemption of state permitting for projects will lead to more rapid construction of transmission lines. It is our perception that state processes already work well, and that the main problems arise with permitting through federal lands.
- How the delegation of authority will address delays in permitting on federal lands.
- What actions are needed to better align and coordinate state and federal agency permitting processes in the West.

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We strongly urge you to consider getting state input before proceeding with the delegation. We believe we could provide you with information and perspective that would be valuable in crafting processes that will lead to better permitting and siting outcomes. WGA remains committed to assisting the DOE however we can to achieve our mutual transmission siting and permitting goals.

Sincerely,

A handwritten signature in cursive script that reads "Pam O. Inmann".

Pam O. Inmann
Executive Director

cc: Lauren Azar