

## Energy - Docket Optical System

**From:** Mark Etherton <mark.etherton@powereng.com>  
**Sent:** Monday, February 23, 2015 12:09 PM  
**To:** Energy - Docket Optical System  
**Subject:** DRECP NEPA CEQA Comments of Southwest Transmission Partners  
**Attachments:** NGIV2 Project Proposed Corridor 050614.pdf

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75129

FEB 23 2015

### Comments submitted on behalf of Southwest Transmission Partners, LLC:

We appreciate the opportunity to provide comments related to the Desert Renewable Energy Conservation Plan ("DRECP") Draft EIS/EIR. Southwest Transmission Partners, LLC ("STP") is developing a new extra high voltage transmission facility primarily within the Imperial County region, known as the North Gila - Imperial Valley #2 Project ("NG-IV2 Project"). The NG-IV2 Project initiated permitting with the BLM in September 2009 with the submittal of the respective SF-299, and was subsequently assigned case number **CACA-51575**. STP has an executed MOU and a fully executed and funded Cost Recovery Agreement in place with the BLM. A map showing the NG-IV2 Project proposed route, which is located primarily within Designated Utility Corridors, is attached to these comments. We expect to finalize alternatives in working with the BLM, county, tribal and other potential cooperating agencies to initiate the scoping process later in 2015 and finalize permitting by the end of 2017. The project is also actively participating in the regional transmission planning through the CAISO, WestConnect; and the WECC Three Phase Rating Process with an anticipated transmission capacity of a minimum of 1200MW (up to 2000MW depending on the configuration).

The 85 mile NG-IV2 Project is a major intertie expansion (single circuit or double circuit) between the existing substations in the Imperial Valley area (Imperial Valley Substation) and the Yuma county area (North Gila substation) in southwestern Arizona. It is proposed to parallel the existing North Gila-Imperial Valley line (also known as the Southwest Power Link, or SWPL) for most of its length, with an expected minimum separation of 250 feet from the existing SWPL to meet reliability criteria. The potential for a second circuit would be proposed to be constructed on the same set of structures, and would potentially loop in and out of the existing Highline substation along the Highline Canal owned and operated by the Imperial Irrigation District.

A primary purpose of the NG-IV2 Project is to promote additional renewable energy interconnections and deliver clean renewable energy to both California and Arizona customers. We understand that the primary purpose of the DRECP is to promote the expansion of renewable energy and the associated transmission facilities required to deliver throughout the region and supports the use of transmission corridors. Therefore, we believe the NG-IV2 Project should be included as one of the transmission lines incorporated into the DRECP analysis as it meets these primary DRECP objectives.

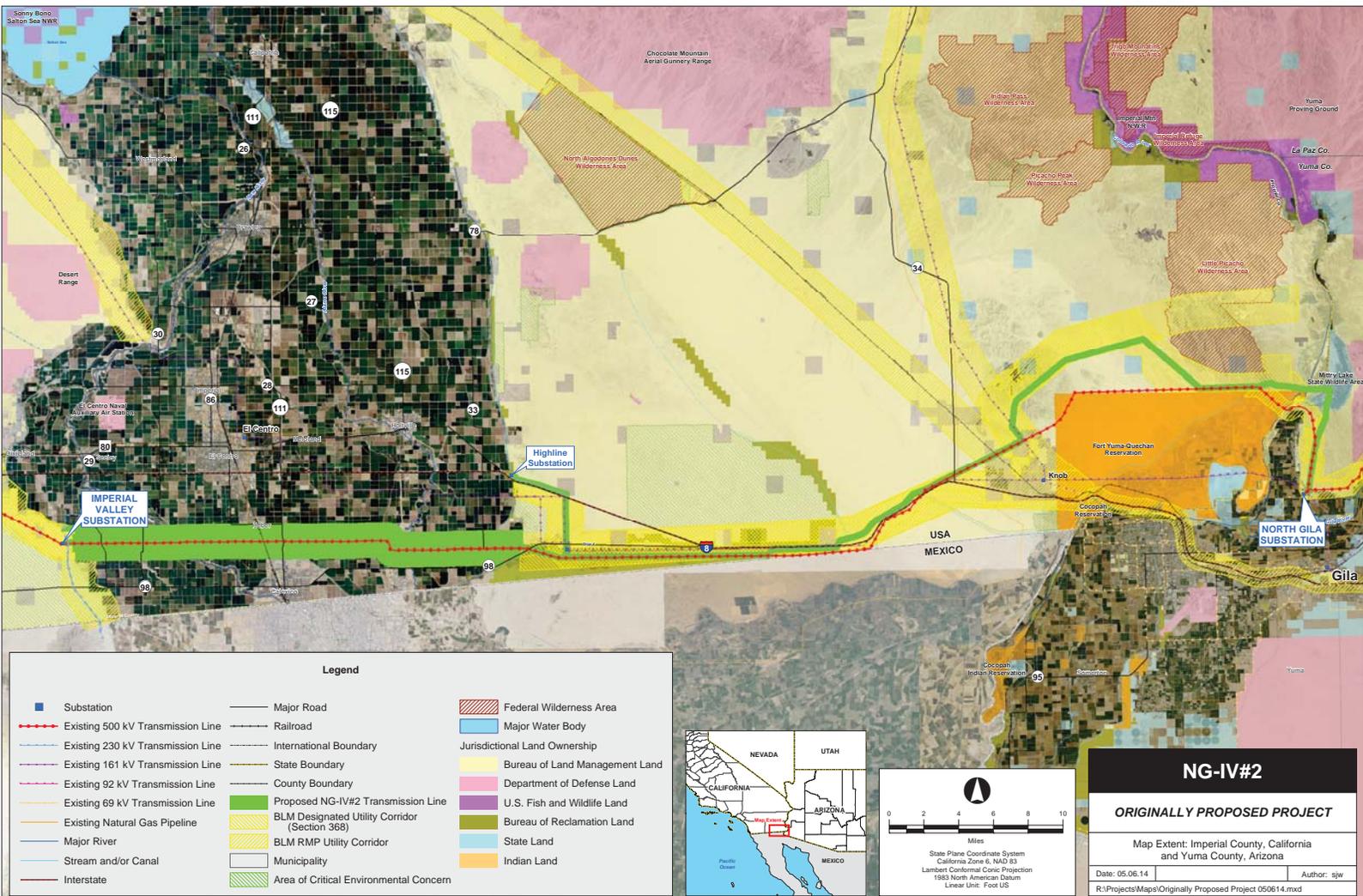
We appreciate the opportunity to submit our comments and look forward to providing any data needed for the inclusion of the NG-IV2 Project in the DRECP analysis.

Thank you again and please give me a call if further clarifications or questions are needed related to the NG-IV2 Project.

Please confirm receipt of these comments for our records.

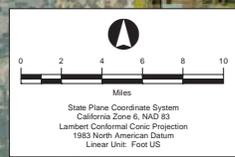
**Mark L. Etherton, P.E.**

Project Manager on behalf of Southwest Transmission Partners, LLC  
Cell: (602) 809-0707



**Legend**

■ Substation	— Major Road	▨ Federal Wilderness Area
— Existing 500 kV Transmission Line	— Railroad	▨ Major Water Body
— Existing 230 kV Transmission Line	— International Boundary	— Jurisdictional Land Ownership
— Existing 161 kV Transmission Line	— State Boundary	▨ Bureau of Land Management Land
— Existing 92 kV Transmission Line	— County Boundary	▨ Department of Defense Land
— Existing 69 kV Transmission Line	— Proposed NG-IV#2 Transmission Line	▨ U.S. Fish and Wildlife Land
— Existing Natural Gas Pipeline	▨ BLM Designated Utility Corridor (Section 368)	▨ Bureau of Reclamation Land
— Major River	▨ BLM RMP Utility Corridor	▨ State Land
— Stream and/or Canal	▨ Municipality	▨ Indian Land
— Interstate	▨ Area of Critical Environmental Concern	



**NG-IV#2**

**ORIGINALLY PROPOSED PROJECT**

Map Extent: Imperial County, California and Yuma County, Arizona

Date: 05.06.14	Author: spw
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