

**“National Interest” Electric Transmission Corridor Threatens
Pennsylvania Landowners, Local Control, Community Character,
Public Health, Sensible Energy Policy, and National Security**

Observations by:

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The Department of Energy’s designation of the so-called “National Interest” Electric Transmission Corridor (NIETC) threatens Pennsylvania landowners, local control, community character, public health, sensible energy policy, and national security. *It will also impose billions of dollars in higher electrical bills on ratepayers to finance transmission line construction when cheaper and more sensible alternatives have been ignored.*

Use of the term “national interest” really bothers me. I see no evidence that the corridor is in the national interest. It could better be described as a federal condemnation zone, or in the words of PJM Interconnection, a transmission “super-highway” to expand use of coal-fired resources. [See PJM testimony to the Federal Energy Regulatory Commission, 5/13/05]

Ironically, this federal “national interest” corridor designation will weaken national security: Hundreds of miles of high-voltage lines and undefended towers standing high above the treeline make an easy target for attack. Making the population dependent on their integrity is the antithesis of good security planning. It doesn’t make sense to force the populations of New Jersey and New York to be dependent on electricity generated in Ohio. In contrast, *a diversified network of small, state-of-the-art generation sources would result in a secure energy system invulnerable to large-scale disruption.*

The push for the NIETC assumes a need that has not been independently verified but rather is based on models and analysis prepared by entities that have a great deal to gain from expanded transmission. Comments submitted to the Department of Energy (DOE) by many experts indicate that there are a range of highly cost-effective and sound alternatives including energy efficiency and conservation measures, demand/response technologies, and existing and approved local generation. DOE did not consider any of these alternatives or verify the need for thousands of miles of added transmission before designating the NIETC.

The Pennsylvania Land Trust Association seeks to protect Pennsylvania's special places for today and for generations to come. The Association is made up of 80 member organizations committed to conserving recreational areas, wildlife habitat, productive farmland and forest, and other open spaces important to Pennsylvanians. Our members are based in communities across Pennsylvania and count tens of thousands of citizens as members.

The Association in all of its history has never seen it necessary to file a lawsuit against anyone. That is, until now. This January we joined with ten other organizations in asking the U.S. District Court to compel the U.S. Department of Energy to perform an environmental impact statement and to consider environmentally-friendly alternatives.

Our reason for taking what for us is an unprecedented legal action is simple. The threat to Pennsylvania and our neighboring states is unprecedented. The condemnation zone encompasses 52 of Pennsylvania's 67 counties as well as 7 other states. Already there are proposals for four new high-voltage transmission lines in Pennsylvania. Each of these proposals could circumvent local and state laws designed to protect the public interest and prevent the unbridled use of eminent domain. There is nothing to stop the federal government from fast-tracking even more lines in the future.

It isn't that we don't recognize the necessity of the occasional well-considered condemnation. Our organizations recognize that reliable electricity is important. Our organizations recognize that, upon occasion, there will be a compelling public interest in condemning a property. However, whether for transmission lines, highways or any other public purpose, *there should be a high bar in considering use of condemnation.*

Perversely, the Department of Energy has established federal eminent domain as the tool of choice for addressing energy interests in the region. Federal eminent domain should be a last resort, rather than the centerpiece of energy policy.

In its last session, the Pennsylvania General Assembly passed a new law for the purpose of reining in potential abuse of eminent domain by Pennsylvania municipalities. The federal eminent domain authority granted to electrical utilities in 52 Pennsylvania counties presents a far greater threat to private property. Additionally, federal eminent domain threatens local control, community character, sensible energy policy, public health and national security.

Condemnation supporters protest that they are simply trying to stop the threat of rolling blackouts. However, there are dozens of ways to meet future energy demands that don't require new interstate transmission lines: energy efficiency, demand-response, wind, solar and other local generation options.

These non-transmission solutions deserve equal consideration and systematic review in the energy planning process. Instead, the federal government has chosen to ignore their existence. This is foolish since these alternatives have the potential to deliver energy resources faster and more economically, with lesser environmental degradation and greater public acceptance than new transmission lines.

The 2006 National Action Plan for Energy Efficiency notes that proven demand-side programs are capable of delivering energy resources at a scale comparable to that provided by constructing new power plants and at a cost far below that of any generation option available today. *The most recent planning efforts for states such as Texas and Florida suggest that these efficiency options can be deployed rapidly enough and at a scale sufficient to more than offset all incremental load growth over the next fifteen years.*

The governor and legislators working to make energy independence a reality, including Representative Eugene DePasquale with his House Bill 1 and Representative Chris Ross with House Bill 31, demonstrate the growing political will in Pennsylvania to address our future energy needs sensibly and responsibly.

In contrast to Harrisburg's energy independence initiatives, a rush to build new high voltage transmission lines threatens efforts to reduce carbon emissions. It would harm air quality, Pennsylvania being downwind of the dirty old coal plants that would get increased business. It would scar our scenic landscapes. It would ignore reasonable expectations that alternatives be considered before taking a person's property.

Supporters of so-called 'national interest corridors' should have to demonstrate that new transmission lines are the only reasonable solution to meeting energy needs before condemnation of property is considered. We need energy strategies that address our 21st century challenges and utilize 21st century technologies. *Local generation, demand-response and energy efficiency most likely can meet our energy needs faster and more cheaply than huge new power lines.* And do it without harming communities.