

FAX COPY

October 24, 2007

Office of Electricity Delivery and Energy Reliability
OE-20
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585
Attn: Docket 2007-OE-01

Request for Re-Hearing

Gentlemen and Ladies;

I have written to you previously on two occasions to discuss the designation of areas of the Northeast as National Interest Electric Transmission Corridors and have provided comments during your public comment opportunity in Alexandria, Virginia. I am very disappointed in your response to my and other comments and your designation of the Northeast Corridor without any consideration of my concerns and without any additional study as I suggested. I hereby ask for a re-hearing on this designation.

As I indicated earlier, there are several important issues related to your designation which need to be addressed.

- 1) The corridor designation is intended to ease the barriers to transport of electricity from Midwestern and other distant sources to eastern markets via new transmission system additions. The designation of these corridors provides a significant advantage to this approach to meeting eastern market needs and, therefore, a disadvantage to all other possible solutions, including demand side measures, new east coast power plants and upgrades to the existing transmission system. The anti-competitive nature of this designation has not been evaluated and its potential impact on other participants and solutions has not been properly considered.
- 2) The corridor designation, by itself, alters the likely pattern of electric system development across most of the northeast. This will have profound environmental impacts on fuel use patterns, air quality patterns, water quality patterns, land use and impacts on sensitive lands. These impacts have not been assessed as they are required to be.
- 3) The designation of these corridors provides no provision for protection of sensitive and historic lands included in these corridors. The potential for construction of high towers and high voltage lines will have significant and wide ranging impacts on properties, parks and sites beneath, near and in view of these proposed lines. Corridor designation, by itself, threatens important easement programs, protection programs, state designations and protections as well as private and public property. No studies of these impacts, and no provisions to mitigate these impacts have been undertaken or proposed.

- 4) The sole solution encouraged by these corridors, long distance transmission, has serious security and vulnerability issues and may be far less secure and reliable than a more balanced and mixed approach. These issues have not yet been addressed.

As I suggested earlier the Congestion Study, on which corridor designation is based, provides DOE with the opportunity to conduct a balanced and comprehensive assessment of alternative means to address these needs, and to assess the economic, financial environmental and security effects of the alternatives. Such an evaluation and study, carried out with broad public participation, would lead to a well-respected and well regarded plan for meeting regional needs in the most effective manner. To my knowledge no such study has been proposed or conducted.

My serious concerns expressed in several ways to you over the last year have not been considered or even commented upon. I, therefore, formally request a re-hearing on the designation of a National Electric Reliability Corridor in the Northeast of the United States.

Sincerely,



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cc: Hon. John Warner
Hon. James Webb
Hon. Frank Wolf
Hon. Tim Kaine