



October 29, 2007

Office of Electric Delivery and Energy Reliability, OE-20
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

The Honorable Samuel W. Bodman
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Attn: Docket No. 2007-OE-01, National Electric Transmission Report,
Cover Letter for Application for Rehearing, Mid-Atlantic Area National
Interest Electric Transmission Corridor

Dear Secretary Bodman:

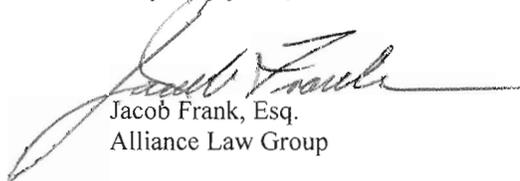
It is respectfully requested that the attached letter application for rehearing from the undersigned be accepted and made of record in the above identified matter.

The undersigned has previously directed to your attention and submitted to your office two letters, by Express Mail and/or Priority Mail, in connection with the draft designation of the NIETC corridors that was published for comment, as is evidenced by the attached letters dated January 18, 2007 and May 21, 2007. These letters were additionally and simultaneously submitted to a number of members of Congress.

Notwithstanding the above, the undersigned has failed to find present in the DOE files, made available to the public, at the DOE online website, that these two letters were made of record in the NIETC draft designation file.

If, for any reason, the attached letter application (of even date herewith) for rehearing is not made of record, in the application for rehearing of the NIETC Report, it is respectfully requested that you timely communicate with and notify the undersigned in writing at the above address, to enable the undersigned to take the appropriate legal action whether it be in the local District Court or At the CAFC.

Very truly yours,



Jacob Frank, Esq.
Alliance Law Group

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Attn: Docket No. 2007-OE-01, National Electric Transmission Report,
Application for Rehearing, Mid-Atlantic Area National Interest Electric
Transmission Corridor

Dear Secretary Bodman:

This application for rehearing seeks reconsideration of the DOE's recent National Electric Transmission Congestion Report ("NIETC Report") printed in the Federal Register on October 5, 2007. This application for rehearing is made in furtherance of earlier letters filed by the undersigned dated January 18, 2007 and May 21, 2007. Copies of these letters are attached. The undersigned is an aggrieved party owning property in Prince William County, Virginia, one of the Virginia counties included in the corridor designations.

It is respectfully submitted that the DOE is abdicating its responsibility to act in the best interests of the citizens of this country by aligning with private industry in the implementation of the corridor designations as proposed in the NIETC Report. The NIETC Report reflects essentially an industry driven proposal that imposes little, if any, obligation on private industry to address and upgrade currently existing antiquated transmission line systems in existing corridors by employing new alternative and efficient technologies.

The NIETC Report, at pages 2 and 3, although responding to meaningful legislative considerations, is inadequate in that the NIETC Report falls short in responding to the legislative intent. More specifically, the referenced considerations [See FPA section 216(a)(4)] as expounded upon in the NIETC Report, fails to address underlying needs which must first be attended to in order for the DOE to fulfill its responsibilities. Each of the considerations taken into account in the NIETC Report, fails to serve the American public in that:

- A. It is **ADVERSE** to the long term interests of this country to essentially subsidize private industry for the new construction of multiple and expensive additional transmission lines in new corridors, that will ultimately add burdensome costs to the use of energy to generate unreasonable prices. Without a detailed evaluation of the overall costs (including but not limited to eminent domain taking) associated with the NIETC Report and a detailed industry analysis as to anticipated energy prices to consumers, the Report is inadequate for lack of its essential purpose.
- B. It is **ADVERSE** to the long term interests of this country to encourage unbridled growth in energy consumption wasting internal energy resources needed to later sustain economic growth in the long term. Without a detailed independent growth evaluation, over at least the next 20

years, for the area impacted by the NIETC Report, as related to anticipated energy requirements in the face of such growth, the NIETC Report is inadequate for lack of its essential purpose.

- C. It is **ADVERSE** to the long term interests of the United States for the DOE to propose energy independence through an extensive increase in inefficient utilization of national energy resources unnecessarily wasting such resources. Without an obligation on private industry to meet future efficiency requirements the NIETC Report is inadequate for lack of its essential purpose

- D. It is **ADVERSE** to the long term interests of the United States for the DOE to implement a national energy policy that supports new construction of multi-state transmission lines in new corridors supplied by inefficient and coal fired generating plants. This is especially so when Congress urges the DOE to first explore technological efficient alternatives that may obviate a need for new transmission line construction in new corridors. No obligation is imposed on private industry to meet any initial efficiency requirements and therefor the NIETC Report is inadequate for lack of its essential purpose.

- E. It is **ADVERSE** to the long term interests of the United States for the DOE to arbitrarily and independently determine that national defense and homeland security need to rely on the new construction of more commercial transmission lines in new corridors. The critical input from these government entities is lacking. Without well considered input from national defense and homeland security the NIETC Report is inadequate for lack of its essential purpose.

The authority given by Congress to the DOE to make NIETC designations is not without limitations. It is conditional in that Congress expects the DOE to act responsibly. Surely, unless and until alternative energy technologies are first proven not to be viable, it is not clear that the massive designation of new corridors will prove to be necessary. The DOE has a primary responsibility to first encourage private industry, which generates and transmits energy, to consider and employ proven state of the art alternative technologies and distribution technologies to conserve energy and make the transmission of energy more efficient. To do otherwise is not only counter productive, it undermines and unfortunately defers the implementation of a successful energy policy for this nation.

The true intent of Congress in the promulgation of Section 216, is evidenced by the recent Congressional letter of October 12, 2007, to the DOE, to urge the DOE to aggressively use its authority to act in the best interests of the citizens of this country.

The DOE points out in the NIETC Report, that it has been investing in the research and development of new technology to help upgrade America's infrastructure and reduce energy demand as well as costs. This is the direction then that the DOE should initially pursue and devote its energies to, instead of being lead by private industry to proceed in its best interests as opposed to the best interests of this nation. For the DOE solely to recognize the value of new technology for making energy transmission more efficient is not enough. The implementation of new technology upgrades and distribution should be a condition precedent to any new corridor designation for new transmission line construction.

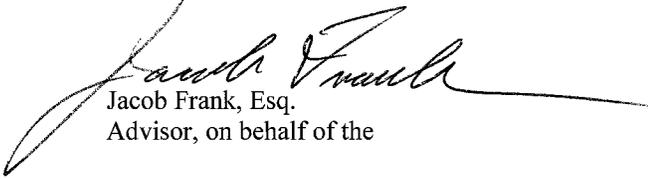
Little will be lost if the requirement for new technology upgrades and distribution is imposed in advance of any new massive corridor designation. Several test projects closely monitored by the DOE could take a relatively short period of time to enable the DOE to make a final determination as to their effectiveness. The prudence of this preliminary approach is crystal clear considering the long term implications and consequences of new transmission construction in new designated corridors.

Should a determination be made by the DOE, that in one or more test projects certain new technology upgrades and/or distribution are insufficient alternatives, only then is it the responsibility of the DOE to consider new corridors for new transmission construction. Perhaps it might be found that one or more of the NIETC designations are unnecessary. Couldn't such an approach be the beginning of a sound national energy policy? To pursue new corridors for new transmission line construction in advance of modern alternative, less impacting and potentially lower cost technological substitutes is illogical. An analogy is putting the cart before the horse.

The proposed NIETC Report designation for new corridors by the DOE, as earlier noted, essentially supports a private industry infrastructure that is primarily designed to encourage the construction of several hundred new coal generation plants. Obviating the need even for a small percentage of such coal generation plants in favor of new technology upgrades and distribution could start an irreversible trend that could make this nation a leader in energy conservation.

Please reconsider your NIETC Report conclusions, amend the NIETC Report to take into account the comments outlined above, and provide for a suitable re-hearing. Accordingly, a delay of the NIETC Report designations in light of the foregoing is respectfully requested.

Very truly yours,



Jacob Frank, Esq.
Advisor, on behalf of the

Thunder Oak Homeowners Association,
Haymarket, Virginia, and
Concerned Citizens of Prince William County,
Haymarket, Virginia, and
Mid-Atlantic Concerned Citizens Energy Coalition

Enclosures: Two previous letters identified above.

CC--Without attached letters: The Honorable Allyson Schwartz, Arlen Specter, Chaka Fattah, Eric Cantor, Frank Wolf, J. Dennis Hastert, James Moran, James Webb, Jeff Bingaman, Jim Gerlach, Joe Biden, John Dingell, John Warner, Maurice Hinchey, Michael Castle, Nancy Pelosi, Paul Kanjorski, Pete Domenici, Robert Casey, Robert McDonnell, Susan Davis, Thomas Davis III, Tim Kaine.

Concerned Citizens of Prince William County, Virginia

P.O. Box 382
Haymarket, VA 20168

May 21, 2007

The Honorable Samuel W. Bodman
Secretary of Energy
United States Department of Energy
1000 Independence Ave., S.W.
Washington, D. C. 20585

Re: Neglect of Responsibility / NIETC Draft

Dear Secretary Bodman:

In prematurely announcing the draft designation of the NIETC corridors, the DOE has failed the citizens of this country, by disregarding the DOE's "mission" responsibilities declared on its website and not performing its due diligence.

The DOE has failed the citizens of this country and is demonstrating its irresponsibility:

1. By **not** observing and complying with the regulatory programs authorized by the Clean Air Act as amended and implementation of clean energy technologies.
2. By **not** preserving this country's cultural and natural resources for which the DOE claims it recognizes its stewardship.
3. By **not** first committing to energy conservation and the implementation of energy efficient policies and technologies such as those recognized by FERQ to be significant.
4. By **not** pursuing the obvious need for an Environmental Impact Statement in advance of its NIETC decision that will have a very clear impact on the environment.
5. By **not** respecting environmental policies in compliance with the legal authority of this country – the Supreme Court.
6. By **not** first exhausting all possible alternatives to allow a windfall to private companies in permitting the seizure of private property of thousands of private citizens and putting others under a cloud.

Although it is true that the DOE's responsibility is to provide for reliable energy, this should **only** occur after observance of such responsibilities and certainly not at their expense. Regrettably the DOE has failed to seriously consider these responsibilities in its hurry to satisfy the economic appetite of special interest groups and private industry, especially insofar as the facts are related to applications concerning Dominion Virginia Power.

Moreover, DOE's mandate under the Energy Policy Act of 2005, is to approve transmission lines within designated corridors **only** if there is deemed **sufficient need**. To determine if there is sufficient need, not only should DOE exhaust all alternative avenues, it should **first** require, (no demand), that the generator and transmission companies like Dominion Virginia Power first maximize conservation and efficiency alternatives, especially alternatives like demand response. Only then there should be a determination of sufficient need.

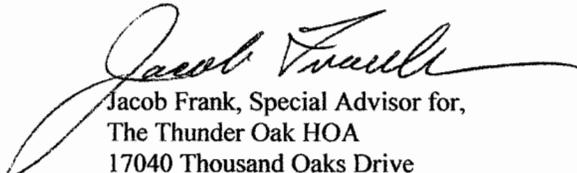
Clearly, FERQ has unequivocally stated that demand response is an important alternative. Yet Dominion Power has not implemented this alternative conservation resource, and has, in reality, ignored this

alternative to the detriment of the citizens of Virginia and surrounding states. What special privilege does Dominion Virginia Power have, for failing to use this critical resource, which the DOE has determined to reward them with special Eminent Domain Powers?

The right of enjoyment to private property is a fundamental right of the citizens of this country. The arbitrary grant of this right by the DOE to private companies without first addressing the responsibilities listed above is tantamount to Eminent Domain abuse and should be avoided by the DOE.

I urge the DOE to reconsider its position and withdraw its draft proposal to set up the NIETC corridors until it has **first** met its responsibilities under its charter.

Respectfully submitted,



Jacob Frank, Special Advisor for,
The Thunder Oak HOA
17040 Thousand Oaks Drive
Haymarket, VA 20169



January 18, 2007

The Honorable Samuel W. Bodman
Secretary of Energy
United States Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585

**Re: Comments on “Request by PJM
Interconnection, L.L.C. for Early Designation
of National Interest Electric Transmission
Corridors” March 6, 2006 (“Application”)**

Dear Secretary Bodman:

I am writing this letter on behalf of the Thunder Oak Homeowners Association, an affected party in the above referenced Application. The purpose is to communicate our concern and comment regarding the proposed 500-kV Meadow Brook-Loudoun transmission line, which is inextricably linked to the PJM National Interest Electric Transmission Corridor (NIETC) application.

All the following comments, unless specifically stated to the contrary, apply to Virginia Electric & Power Company/Dominion Virginia Power (“Dominion”), a member of PJM Interconnection, and to the proposed Meadow Brook-Loudoun transmission line.

Preliminary Comments

There are multiple issues in the Application and the Department of Energy’s (DOE’s) related National Electric Congestion Study which are of serious concern to us. Deficiencies in the Congestion Study need to be addressed and remedied. PJM’s Application for designation of specific corridors not only underscores such deficiencies but is, additionally, in substantial conflict with PJM’s responsibilities as a Regional Transmission Operator (RTO), existing regulations governing RTOs, the DOE’s charter, various environmental acts, and concerns underscored by Congress. These and other issues will be addressed in greater detail below.

Detailed Comments

Congestion Study Deficiencies

Our review of the Congestion Study reveals a number of major deficiencies believed to make the designation of corridors at this time premature and contrary to the public interest. As a minimum, and prior to the filing of NIETC applications, DOE should require an environmental impact study and meaningful consultation with the states pursuant to the National Environmental Policy Act and Section 1221 of the Energy Policy Act. Designations of corridors on the scale contemplated in the Congestion Study constitute major Federal actions that could have a significant adverse affect on the human environment. Environmental studies of the impact of these large-scale corridors are absolutely essential. Moreover, the Congestion Study's requirement to "consult" with affected states would appear to mean more than a simple, superficial requirement to seek comment from the states.

One would additionally expect that the DOE develop beforehand a comprehensive methodology and criteria for identifying and quantifying transmission congestion throughout the affected areas, including a cost benefit analysis. All alternative transmission solutions should be explored including alternate routes; state-of-the-art, commercially available alternatives; demand-side measures; and, cross-regional implications.

In the absence of precise guidelines, it is more likely than not that the application process will have little consistency between RTOs or between applications within the same region. Without these guidelines the DOE runs the risk of creating a highly contentious process that will create inequities and, more importantly, frustrate Congressional intent.

PJM's Request for Corridor Designations

Deficiencies with respect to the Congestion Study are practically self-evident in PJM's request for the designation of three corridors within its service area. PJM's requests are so broad they are almost unbounded and truly frightening. If approved, there would be few areas within a huge region where the potential for federal backup siting of transmission facilities would not apply. Moreover, such potentially unbounded designation areas virtually preempt any state siting authority over transmission facilities within its boundaries. This is arguably in conflict with the more limited Federal role intended by Congress.

With respect to PJM's specific NIETC application, PJM virtually ignores, downplays, or fails to adequately address many functions in which Dominion has been a laggard -- functions which are explicitly required of RTOs and their associated members under Code of Federal Regulations (CFR) Title 18, Part 35.34. Among these required functions are that RTOs deliver electricity efficiently, and that construction of new transmission facilities is based on demonstrable need and sound planning assumptions.

Moreover, the large contiguous regional corridors proposed by PJM's Application would seem to compel a comprehensive environmental analysis by the DOE to consider and evaluate the wide-ranging, long-term impacts that must be addressed, pursuant to provisions of the National Environmental Policy Act.

Efficiency

Efficiency plays a paramount role in any sound energy plan. Some might consider efficiency as the foundation for any such plan. It is not by chance that "efficiency" is listed before "reliability" in the purpose statement of 18 CFR, Part 35.34 (a) and that it is enumerated as important in no less than nine additional places in Part 35.34.

Implementing efficiency upgrades is separately identified and emphasized in the Regulation as a prime RTO responsibility as part of the planning process. Furthermore, DOE has repeatedly treated energy efficiency as a maxim.

The Federal Energy Regulatory Commission's (FERC's) August 2006 Staff Report, *Assessment of Demand Response and Advanced Metering*, makes a strong case for improving efficiency through the use of alternatives other than new transmission infrastructure. Interestingly, this assessment reflects that Dominion's use of Demand Response is among the lowest in the nation. It is evident that Dominion has not assertively pursued such alternatives and thus has failed to carry out its responsibilities efficiently, pursuant to the Regulation. It should be noted that Congress has also advocated use of advanced metering. (See 1252 (e)(3) of EPAct - 2005). Thus, it could be argued that PJM's disregard for, or minimization of, the value of such alternatives (especially considering Dominion's poor track record) is in conflict with Congressional intent and the referenced FERC Report, which states that "Demand Response deserves serious attention".

Additionally, before any application is approved, Dominion should be required to reasonably exploit other proven, state-of-the-art management technologies and upgrades to increase efficiency. Clearly, much can be done to reduce energy requirements within Dominion's existing grid system. An abundance of proven, advanced technology is available to significantly increase the carrying capacity of existing lines and obviate the need for new ones. There is little evidence that Dominion has adequately explored any of these technologies to make its transmission of power more efficient, or that it has sufficiently considered and evaluated the use of conservation technologies, including alternative energy sources, to reduce consumer requirements.

Unfortunately, many utilities have not been motivated to pursue modern technologies or alternative energy sources, given the ease with which many state commissions have certified new lines. Instead, utilities continue to rely upon early 20th century methods. One interesting and very simple possibility comes to mind, drawn from recent Dominion advertisements in northern Virginia featuring the conventional light bulb which Dominion promises to keep burning *only* if it is permitted to build more transmission lines and transport out-of-state power into Virginia. Instead of building new transmission lines to fuel old lighting technology, PJM/Dominion could readily pursue a marketing

program to replace antiquated 1930s light bulbs with new energy-saving technology. Even if only half of the fifty million consumers in PJMs service area would make such replacements, the ensuing energy savings would preclude the need for a number of new transmission lines throughout the Northeast.

Such an energy conservation program is obviously in the best interests of the country. The DOE should require RTOs to employ best practices and innovation to make the transmission of power more efficient. Better efficiency with advanced technology improvements, if handled properly, should not only reduce the need for new lines but should yield significantly better user rates in the long term. Given this premise, PJM's argument that congestion on the Mt. Storm-Doubs line requires construction of the Meadow Brook-Loudoun line will be hard to sustain. It would appear that the first and most obvious step is to upgrade the Mt. Storm-Doubs line and simultaneously to employ Demand Response and conservation alternatives. Dominion should not be rewarded for its dismal record. Otherwise, it may send the wrong message to RTOs.

Surely, are not the above-mentioned alternatives examples of what the efficiency requirement of 18 CFR 35.34 is all about? There is no legitimate excuse for Dominion not to evaluate and fully employ all available alternatives before a new transmission line is considered. Are PJM and Dominion to be absolved from first taking the most obvious path of efficiency, before embarking on the path of new construction?

Need

Even if alternative solutions were not employed, our technical experts advise us that the proposed 3000 MW transfer line capability for system contingencies in Northern Virginia constitutes infrastructure overkill by a minimum of 700 percent, since the energy shortfall is believed to be only about 400 MW. The additional power requested in the Application for the Meadow Brook-Loudoun line is simply not needed to guard against the yet unsubstantiated threat of blackout situations.

Directly bearing on the alleged need for the proposed Meadow Brook-Loudoun transmission line, is the recent recommendation for the issuance of permits by the Nuclear Regulatory Commission for early construction of units 3 and 4 of the North Anna facility. When these units become operational in a few years, they will provide an additional 9,000 MW of new generation for our region, seemingly precluding the need for the additional infrastructure being applied for. That said, Dominion has refused to make public the underlying economic and technical data, assumptions, and other analyses, upon which it bases its assertions. Both the ratepayers and those of us directly impacted by the proposed Meadow Brook-Loudoun line have a right to this information.

Clean Air Act

We view the PJM proposal, to the extent it relates to the proposed Meadow Brook-Loudoun transmission line, to be inconsistent with and in conflict with the intent of the Clean Air Act of 1970 and 1990. This should be a major DOE concern in light of

Congressional emphasis on use of less-polluting, alternative energy sources as a way of preserving our country's economy, security, and welfare, and given DOE's stated commitment to implement the provisions of this legislation.

It is well understood that many northeast and mid-Atlantic cities are in non-attainment zones due to emissions from coal-fired generators in the mid-west. The economic motivation to bring low cost power to the region is equally well understood, and the PJM Application acknowledges that a number of unclean feeder plants will be used to supply the Meadow Brook-Loudoun line. However, freely granting corridors and permitting transmission lines that would increase emission output from these plants is patently bad public policy.

As you are aware, California has just passed a law that seeks to force managers of coal-burning plants in the western United States to install cleaner technology if they want to sell power in California. In light of demands for increasingly strict environmental controls in other areas of the country as well, we trust that the DOE would not countenance applications for power transmission lines that would run contrary to such concerns and the intent of the Clean Air Act.

Planning Assumptions

Equally significant, the official growth indicators and power usage estimates for Northern Virginia do not substantiate the need for a new high-voltage transmission line. These official figures differ from Dominion's independent and perhaps biased projections.

Likewise, several member utilities of PJM have questioned the planning assumptions used to justify the Meadow Brook-Loudoun line. PSEG of New Jersey found that planners had not factored in the long-term impact of new generation and demand side resources before approving the line. The Long Island Power Authority questioned whether less costly alternatives to this new infrastructure had been explored. Clearly, in this regard, neither PJM nor Dominion has considered the impact of increased production capacity that will become available upon completion of the two new units at the North Anna nuclear facility.

Eminent Domain

The far-reaching impact of PJM's Application is enormous. It cannot be imagined that Congress intended for the EPOA of 2005 to give profit-motivated, private enterprise the breadth of authority under the auspices of Eminent Domain that is contemplated in PJM's Application. Such seizure of private property in states such as Virginia (where just compensation is not offered) would be a windfall for private companies and would result in serious economic harm to individual Americans. (See www.vaproperyrights.org). Is this now to be a cloud under which millions of American landowners, private companies, and state/local entities, will live? The Application deserves outright rejection for this reason alone. Barring any real National energy emergency cited as such by Congress, such a broad taking of private property by corporate entities should not be countenanced.

Also of concern is Dominion's seemingly flagrant disrespect for the Northern Virginia area and population, which is virtually within eyeshot of the nation's capital. This area is part of our colonial heritage. Construction of the Meadow Brook-Loudoun line would destroy environmentally sensitive sites, historical properties, and nature preserves; and the property of thousands of private citizens would be impacted, jeopardizing their property values and quality of life.

Seizing private property through Eminent Domain under terms of the Application, without exhausting all possible alternatives and barring a National emergency, would, in our view, constitute Eminent Domain abuse.

Environmental Impact Statement

The PJM Application was filed without an Environmental Impact Statement. Given the extent of the area under consideration for a NIETC, and the significant adverse effect on the human environment that would be inflicted by the Meadow Brook-Loudoun line, it would appear that an Environmental Impact Statement should be mandatory. We respectfully submit that requiring such a statement is in order.

Misguided Priority

In our estimation, Dominion is pursuing the Meadow Brook-Loudoun line for the primary benefit of its shareholders, not the ratepayers. Since its stated purpose is to guarantee system integrity (i.e., peaking service), it will be used for the ratepayers of Virginia only during peak hours and under certain contingencies. At all other times, the sole purpose of this transmission line will be to provide Dominion with access to the lucrative Northeast Power markets. If this new transmission line is designed to be used primarily for the conduct of merchant transmission business, then it can be construed as a misuse of Dominion's putative obligation to serve and, again, the irresponsible abuse of the Eminent Domain privilege.

Conclusion and Recommendation

We respectfully request that the DOE correct the procedural and substantive deficiencies in its process for designating NIETC corridors, withhold designation of the corridors requested by PJM, and avoid taking any action that would compromise state decision-making.

Specifically, we submit that the proposed Meadow Brook – Loudoun transmission line in the PJM Application deserves rejection for at least the following reasons:

1. The Application is not consistent with the public interest.
2. The Application is not consistent with a sound National energy policy.
3. The Application does not show that Dominion has maximized the transmission capabilities of existing towers or structures.

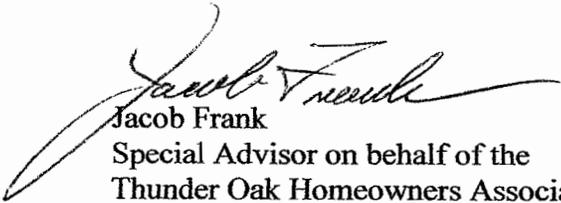
4. The Application does not adequately address the need for the Meadow Brook-Loudoun line.
5. The Application is not consistent with the Clean Air Act.
6. There are alternative corridors/lines that could more appropriately meet the requirements set forth in the Application.
7. The Application is based upon incorrect planning assumptions.
8. The Application is inherently abusive in that it legalizes the taking of private property without just compensation.
9. The Application is inherently abusive in that it legalizes the taking of private property when a need is not sufficiently proven to exist or when alternative solutions are available.
10. The Application appears to be designed primarily to benefit Dominion's shareholders to the detriment of Virginia ratepayers.

We believe that, independent of the above, power providers have the responsibility of meeting consumer requirements efficiently with the existing infrastructure before investment in new costly projects. We believe that it should be a tenant of public policy for power providers, when submitting siting proposals, to promote conservation, move energetically toward the use of alternative energy sources, invest in state-of-the-art technologies, and consider multiple alternative routes before proposing construction of new lines. We believe that public power companies have the responsibility of putting protection of the environment and private property rights of Americans ahead of their own economic gain. In our view there is little to gain and much to lose if the Meadow Brook – Loudoun transmission line is approved.

We urge the DOE and the FERC to take pause and thoroughly analyze the concerns we have advanced, carefully considering the far-reaching implications of this NIETC Application.

We thank you for the opportunity to express our concern and comments. We look forward to working with you to develop the most effective, equitable process for addressing this most important set of issues.

Very truly yours,



Jacob Frank
Special Advisor on behalf of the
Thunder Oak Homeowners Association