

Nov. 12, 2014

Honorable James Allison, Chairman
Honorable Herbert Hilliard, Vice Chairman
Honorable Kenneth Hill
Honorable David Jones
Honorable Robin Bennett

Tennessee Regulatory Authority
502 Deaderick St., 4th Floor
Nashville, TN 37243

***IN RE: PETITION OF PLAINS AND EASTERN CLEAN LINE LLC FOR A CERTIFICATE OF
CONVENIENCE AND NECESSITY APPROVING A PLAN TO CONSTRUCT A TRANSMISSION
LINE AND TO OPERATE AS AN ELECTRIC TRANSMISSION PUBLIC UTILITY***

Dear Directors,

If all their claims were true; if this was the wisest way to utilize wind energy; then, for the greater good, private citizens would have to suffer losses like they did for the interstate highway system, for existing power lines, for gas and oil pipelines, for the railroads, even though many suffered needlessly as these projects were run by people who overreached and underpaid landowners and other abuses.

BUT, their claims are NOT true, this is NOT the wisest use of wind energy or grid expansion. Private Citizens will suffer irrevocable lose for generations for the profit of a few billionaires and their companies.

This is NOT the best way to get to a clean energy grid but it is a good way for CL to make money off of other people's money and lives.

In 1964 construction began on the Truman Lake Reservoir in MO. Federal eminent domain took 1/3 of the town of Osceola, Mo. They took my grandparents Cheese Factory on the river and their home place on the Bluff. Fifty years later, the factory site isn't underwater, it's a public access boat ramp. The home place that the Corp was going to use for an office is completely unused and, of course, not under water. I would have inherited the home place on the bluff but the Feds took it even though they didn't need it and haven't used it in 50 years.

When I 40 was being built across AR, my husband parents ended up with their 40 acres cut in 2 pieces by the interstate. The house and barn can still be seen very close to the interstate, the other piece was inaccessible. The value of that land was lost forever changing the lives of my husband's whole family for generations. In this case, for the greater good, you have to accept it and go on.

BUT, this transmission line is NOT for the greater good of citizens, the state of Arkansas or the nation.

In my research into this issue I have discovered many things that cause me grave concern and I have outlined them as follows:

Issues with Plains & Eastern, Clean Line Energy Partners, LLC.
Private investor owned speculation (Ziff Bros. ZBI Ventures, Zikha Family, Michael Skelly, EDP - a Portuguese Co, NG a United Kingdom Co.) for profit alone

- Ziff Bros. ZBI Ventures, Zikha Family - Billionaires from gas and oil industry.
- Private company seeking Federal Eminent Domain to override AR constitution by seeking Federal participation, i.e. Tax Dollars to make a profit while taking land from private taxpaying citizens. DOE EPA ACT 2005 Section 1222
- Michael Skelly, former CEO Horizon wind, formerly Zilkha Energy, sold for 2.5 Billion + to Portuguese Corp, 20 % owned by Portuguese government. [EDP Buys Horizon Wind From Goldman for \\$2.15 Billion \(Update7\) - Bloomberg](#)
- Horizon offered 'Good Neighbor Agreements' giving cash for silence about concerns living near wind generators. <http://www.lincolncourier.com/x1743983672/Developer-offers-deal-for-neighbors?template=printart>
- A United Kingdom company, National Grid, invested \$40 million and will own a substantial portion and possibly buy it outright. http://www.nationalgridus.com/niagaramohawk/a3-1_news2.asp?document=7365

Business practices:

- Landowners last to know: in our area many in the path still don't know. I spoke with some in the path just an hour ago that had never heard of it.
- Using college students to pack meetings
http://www.mycaldwellcounty.com/news/article_563dad0c-19b3-11e4-bc92-001a4bcf6878.html
- Recruiting students in AR <http://www.asuherald.com/news/view.php/850051/A-State-students-involved-in-clean-energy> ATU Engineering and Chem Club to pack hearings
- Unknowledgeable representatives who are paid to speak to public
- Contracted land agents who aren't accountable and misrepresent the truth to landowners
- Attempting to transfer Federal Eminent Domain Authority to a private company purely for profit with no demonstrated need for the good of all let alone AR.

Claims and Promises: And Evidence to the Contrary

- **Wind is cheap and reliable.**
 - Top 10 wind using states in US have seen electricity costs rise 20%
<http://www.forbes.com/sites/jamestaylor/2014/10/17/electricity-prices-soaring-in-top-10-wind-power-states/>

- Germany and Japan have rushed to get wind and solar online by shutting down nuclear and coal only to reap economic havoc with soaring prices. This has caused loss of industry while creating hardship for businesses and consumers alike.
 - <http://www.dissentmagazine.org/article/green-energy-bust-in-germany>
 - “Germany’s Energy Poverty”
<http://www.spiegel.de/international/germany/high-costs-and-errors-of-german-transition-to-renewable-energy-a-920288-druck.html>
- Current research on wind and solar urges local generation and **distribution not long range transmission.**
 - <http://docs.wind-watch.org/Rational-Look-Renewables.pdf>
 - <http://docs.wind-watch.org/boonej-waywardwind.pdf>
 - <http://docs.wind-watch.org/ProblemWithWind.pdf>
 - <http://energy.gov/articles/top-9-things-you-didn-t-know-about-distributed-wind-power> Even a Dept. of Energy publication agrees.
 - <http://www.renewableenergyworld.com/rea/blog/post/2014/01/how-to-build-a-clean-energy-grid?page=all>
 - Difference between name plate capacity for wind generators and actual power generated. Germany’s wind yields 17%.
<http://www.dissentmagazine.org/article/green-energy-bust-in-germany>

- **Hundreds of Jobs**

- According to testimony in TN Temporary Construction Jobs – 2-3
 - Permanent Full Times Jobs Converter Station: **16** and for Line Maintenance: **10**
 - And, they would not commit to using local contractors.
<http://www.tn.gov/tra/orders/2014/1400036s.pdf>
 - In KS they are NOT using local contractors or laborers
- **Converter Station for AR** – promised AFTER denied Public Utility Status by the AR Public Service Commission, not in original plan as described by investors UK National Grid in Nov. 2012, but they are not obligated to deliver. 500 MW, but who will buy it? And it won’t be all wind!
 - **Increased Taxes** – but LOSS of Property Tax for ROW and surrounding properties forever!
 - **Wind industry manufacturing Business to AR** – They can’t hire anyone or order anything!
 - **It’s Safe** – A Literature review of scholarly research not associated with financial gain:
 - Farmers with sick and dying cattle living with power lines were the first to sound the alarm.
 - Children living within 650 feet of power lines had a 70% greater risk for leukemia than children living 2,000 feet away or more. From the British Medical Journal, June, 2005:
 - “Several studies have identified occupational exposure to extremely low-frequency electromagnetic fields (EMF) as a potential risk factor for neurodegenerative disease.” Epidemiology, 2003 Jul;14(4):413-9:

- There is “strong prospective evidence that prenatal maximum magnetic field exposure above a certain level (possibly around 16 mG) may be associated with miscarriage risk.” From Epidemiology, 2002 Jan;13(1):9-20
- In a study of 850 lymphoma, leukemia and related conditions, researchers from the University of Tasmania and Britain's Bristol University found that living for a prolonged period near high-voltage power lines increased the risk for these conditions later in life. From the Internal Medicine Journal, 2007
- People who lived within 328 yards of a power line up to age 5 were five times more likely to develop cancer as an adult.
- People who lived within 328 yards of a power line at any point up to age 15 years were three times more likely to develop cancer as an adult.

Objections and Cautions:

- **There is no such thing as a clean line** – this line, any line- cannot be dedicated to wind, it is impossible. Wind is intermittent, electric power must be constant. Wind can only supplement the power on the grid. Best estimates are about 31 % of the entire nations power could someday come from wind.
- **Clean Line is not a part of any Regional Electric Energy Plan.** Meanwhile local utilities like Entergy are actively upgrading and expanding the grid and reducing coal just like every other utility in the country.
http://www.eei.org/issuesandpolicy/transmission/Documents/TaaG_E-K.pdf
http://www.oatioasis.com/EES/EESdocs/EAI_2014-2018_Draft_CP_2013_Summit.pdf
- **Clean Line is not a utility.** They have no power to sell and no customers to buy it. They want to build a HVDC line and sell it after getting the land through Federal Eminent Domain.
- **CAUTIONS from OK** Please read what OK is up against now:
<http://news.yahoo.com/decade-welcoming-wind-states-reconsider-170411568.html>
- **Lessons need to be learn from other countries** that have rushed into green energy and are experiencing deep economic problems because Wind and Solar aren't living up to the promises of cheap reliable energy. Germany is a prime example:
 - [Germany's Expensive Gamble on Renewable Energy - WSJ](#)
 - [Green Energy Bust in Germany | Dissent Magazine](#)
 - [German Energy Reforms Could Spell Trouble for Small Renewable Energy Producers](#)
 - [GERMANY: Renewable Energy Policy “Complete Failure”... Bring On The Dirty Coal Monsters : SRSrocco Report](#)
 - [High Costs and Errors of German Transition to Renewable Energy - SPIEGEL ONLINE](#)
 - [Druckversion - Germany's Energy Poverty: How Electricity Became a Luxury Good - SPIEGEL ONLINE - News - International](#)
 - Sweden and France have been successful, Germany, Denmark, Japan and Spain have not. We need to take heed and add wind and solar to the existing grid by upgrading, expanding and developing wise use of our wind and solar resources. LONG distance transmission has

no place in a sensible plan. Local generation and use will reduce the need for long distance transmission. HVDC has its place in our energy future but not 700 miles at a time. It is being used successfully in much shorter distances and being placed underground.

Questions about wind in general?

- Will the plains be sacrificed to wind farms until there is no land left?
- How many bird deaths are OK? Endangered Species are being killed in CA with no repercussion because wind farms are exempt. The proposed AR route bisects the Mississippi Flyway for water fowl.
- How much local temperature change due to wind generators is OK? Temps rise and night and lower during the day.

Wind potential and actual wind generated power are two different things. In Germany wind delivers an average of 17 % of its peak potential annually. Is it worth the investment? Many who aren't in the business of making money have much to say about the place of wind in our new energy economy. Wind can supplement existing sources and is best used locally.

- <http://docs.wind-watch.org/boonej-waywardwind.pdf>
- <http://docs.wind-watch.org/ProblemWithWind.pdf>
- <http://docs.wind-watch.org/Rational-Look-Renewables.pdf>

Questions about ARKANSAS? Is it worth it?

- Is there any benefit for Arkansas now or in the future in this project? **NO**
- **Will this project cause any harm? YES**
- How much will AR Tourism suffer? How much is OK? Hwy 7 is on the verge of moving ahead economically, Cliff House is open, Dogpatch property is being developed again.
- How much property devaluation is OK?
- How much negative environmental impact is OK?
- How much health risk is OK?

Big Picture Long Term View Fundamental Questions:

1. **Should we allow a Private business to take taxpayers land using taxpayer money to use solely for their corporate profit through the use of Federal Eminent Domain and Participation according to Sec. 1222 of the EPA ACT of 2005?**
2. **Should we allow a private business to take land from Arkansans and sell it to the highest bidder which appears to be a UK company, National Grid? Michael Skelly has already sold Wind farms in the U. S. Plains to a Portuguese company 20% owned by the Portuguese Government.**
3. **Do we want other countries owning our power and power grid?**

Concluding paragraphs from <http://docs.wind-watch.org/Rational-Look-Renewables.pdf>

Eyes Wide Open

*“As our nation embarks on the path of a green policy, we should recognize the U.S. electric sector, built over the last 100 years, has been successfully engineered for **reliable low-cost energy**. It has served us exceedingly well and has made a major contribution to our standard of living in virtually all areas of modern life.*

*As we **consider how best to transition to a greener energy economy**, we must move forward cautiously and recognize that such a transition will take years, if not decades. After all, how can we expect to reinvent in a few years what took a hundred years to build in the first place?*

*Renewable energy can be helpful to meet improved environmental targets, but we the people must recognize that the **environmental benefits will come at a high price: an increase in electric rates, an increase in capital requirements, a challenge to grid reliability and net job losses**. Only with our eyes wide open can we strike an informed balance and adopt a thoughtful energy policy without hype and pretense.”*

But, this project is not really about wind energy, it's about making money for a corporation on the backs of the taxpayers of Arkansas with no benefits, only harm in return.

Clean Line attempts to drape themselves in the clothing of clean energy from wind and jobs for states they intend to traverse but the 'emperor has no clothes'.

Sincerely,

Cynthia Callahan

Pope County Resident