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**Subject:** public comments to Western Transmission Infrastructure Program

Regarding Western's Transmission Infrastructure Program ("Program") for Recovery Act funding, we submit the following public comments. All of these comments are to better clarify the "Project Readiness" criteria critical to the Program's success. They are characteristics of projects that have a higher chance of getting financed with provisions of the Recovery Act:

1. We believe that Western should put a higher priority on projects that are already in a Western LGIP queue. The justification for this higher priority is that these projects have made substantial progress and investment compared to sites that are not yet in the Western queue. They also have a better chance of beginning construction by the end of 2010, and can therefore take full advantage of the solar Investment Tax Credit cash grant provision of the Recovery Act.
2. We believe that Western should put a higher priority on projects that are sited on private land. The justification for this higher priority is that the permitting required for projects on private land can be accelerated as compared to projects sited on State or Federal land. Bypassing State and Federal land grant bottlenecks, they also have a better chance of beginning construction by the end of 2010, and can therefore take full advantage of the solar Investment Tax Credit cash grant provision of the Recovery Act.
3. We believe that Western should put a higher priority on projects that have established site control. The justification for this higher priority is that these projects have a better chance of beginning construction by the end of 2010, and can therefore take full advantage of the solar Investment Tax Credit cash grant provision of the Recovery Act. There is also less risk that a project will be selected for the Program and withdrawn later due to site control "fatal flaw" issues that come up after the Program has invested in the project.
4. We believe that Western should put a higher priority on projects that are adjacent to, interconnecting with, and/or constructing new transmission lines in Section 368 Energy Corridors and/or Utility Corridors. The justification for this higher priority is that the NEPA permitting (EIS) has already been conducted for the transmission line right-of-way, and development and permitting delays will be minimized. Another advantage is the potential to have natural gas pipelines in the Energy/Utility Corridor, which can provide backup fuel for the renewable project, resulting in a minimization of NEPA permitting boundaries and time, as well as better utilization of the products available in the Energy/Utility Corridor. They also have a better chance of beginning construction by the end of 2010, and can therefore take full advantage of the solar Investment Tax Credit cash grant provision of the Recovery Act.
5. We believe that Western should put a higher priority on solar generator projects over wind generator projects, because solar

generators better track the electrical peak load profile.

6. We believe that Western should put a higher priority on solar generator projects with energy storage capability over those without, because solar generators with energy storage better track the electrical peak load profile.

7. We believe that Western should put a higher priority on projects that use proven and financeable technologies (e.g., parabolic trough, molten salt storage) over projects that use emerging technologies (e.g., Stirling dish, linear Fresnel concentrators, solar chimney, solar tower). The justification for this higher priority is that proven technologies have a better chance of beginning construction by the end of 2010, and can therefore take full advantage of the solar Investment Tax Credit cash grant provision of the Recovery Act. They also have a better chance of being financed and built.

8. We believe that Western should put a higher priority on projects that have completed a System Impact Study (SIS). The justification for this higher priority is that these projects have made substantial progress and investment compared to sites that have not completed the SIS. This significant technical milestone gives the project a better chance of beginning construction by the end of 2010, therefore being able to take full advantage of the solar Investment Tax Credit cash grant provision of the Recovery Act.

Respectfully submitted,

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