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To: <txprogram@wapa.gov>
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Subject: public comments to Western Transmission Infrastructure Program

Regarding Western's Transmission Infrastructure Program for Recovery Act funding, we submit the following public comment.

Western's Mead Phoenix Project (MPP) 500 kV transmission system is located in a prime region for renewable energy projects, both solar and wind. MPP was originally designed as an HVDC system. It has been operated as an AC transmission system since it first came online. There is a finite probability that the MPP will one day be converted to HVDC. Large generators connected to the MPP are required (by the MPP LGIP Agreement) to bear the financial burden of any conversion at their facility (or change their interconnection to an alternate AC transmission system). Both options are extremely expensive to the renewable energy facility.

We request that Western, the largest Participant in the MPP, establish a reserve account to be used for financing the HVDC conversion of MPP-connected renewable energy generators, if MPP is so converted in the future. This will encourage renewable projects to connect to the MPP, and will help them to get financed. Without this reserve, it will be difficult for developers to get their MPP projects financed, due to the risk of substantial conversion costs occurring at an unknown time.

Respectfully submitted,

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