

Connected Actions—the Gateway West Example

PROJECT COMPONENTS

The Gateway West (GW) project is a 1,100-mile long high-voltage transmission line project, jointly proposed by Rocky Mountain and Idaho Power Companies. It is composed of eleven segments that run between nine substations. The substations are (1) wholly part of the GW project, (2) planned to be built prior to GW as part of other projects and subsequently expanded for GW, or (3) existing substations, also expanded for GW. These segments start at the planned Windstar Substation close to the Dave Johnston Power Plant near Glenrock, Wyoming and continue west until reaching the planned Hemingway Substation, proposed approximately 20 miles southwest of Boise, Idaho. In addition, the project includes ancillary facilities such as access roads, cathodic protection and communication systems.

The BLM's decision is whether or not to grant a right-of-way for one or more transmission line segments across public lands in Wyoming and Idaho. The project is about half on private and half on public lands. "But for" the public land segments, the project could not move forward. Therefore, and even though the BLM has no authority over the private lands, the GW NEPA document examines the entire project as a "connected action" requiring full analysis in the NEPA document. This includes all segments, ancillary facilities, substations that would only be built if the GW project were approved, and expanded portions of existing or planned substations for other projects that would only be expanded if the GW project were approved, regardless of land ownership.

Each segment of the GW project serves slightly different project needs but is also part of a larger project. Even though each segment will be built independently and could operate independently on other segments (though not at full capacity), all eleven segments are considered part of the larger GW project – they are "connected actions" because they depend in part on the larger action for their justification.

GENERATION

Scoping comments stated, "BLM needs to analyze the generation sources that will be on this power line and what the greenhouse gas emissions will be induced by the development of the proposed project (comment letter, 7/3/08)." One interpretation of this comment might be that GW and the generation sources that have requested interconnection to this transmission line be considered "connected actions".

Generation is not a “connected action” because:

The requests for generation interconnection are made to multiple carriers, including other utilities. If the GW applicants are unable to respond to an interconnection request due to a denial of a ROW grant from BLM, other transmission line carriers may respond. Therefore, the new generation requests do not qualify as connected actions under the “automatically trigger” criterion.

GW can proceed without any one generation project. The GW applicants have received multiple interconnection requests from multiple generators. The overall demand, rather than any one project, has provided part of the impetus for the project. Therefore, the “but for” criterion is not met, and no particular generation project is necessarily tied to GW.

There are competing proposals to carry new generation to various markets, including markets further south in Nevada, California, and Arizona. If GW is not built, the generation will still be built and other projects could reasonably be expected to carry the additional electricity to market. Therefore, the generation projects do not “induce” the GW project.

DEMAND GROWTH

There may be concerns that the construction of a high-voltage transmission line will “induce” growth, especially industrial growth that requires volumes of reliable electricity. This is a challenging question, because regulated utilities are *required* to serve the demand that develops or is predicted to develop. Each state’s Public Utilities Commission require each utility to develop and periodically update an integrated resource plan (IRP). These plans reflect the projections of growth in their respective service areas and provide a public recognition of both demand-side management and of the real and projected demand under various scenarios. These plans also make public the impacts of conservation measures implemented by consumers, both domestic and commercial, on the overall load demand.

Load growth and GW do not pass any of the “connected action” tests because:

Load growth, whether industrial, commercial, or residential, puts a strain on the existing grid to supply additional electricity. While the existing grid can, and does, meet the demand, as the load on each of the transmission lines grows, the opportunity for spreading that load on remaining transmission lines, should one fail, drops until the loss of a single transmission line can cause a cascading blackout scenario. While GW will alleviate the strain on the grid, it is not “automatically triggered” by load growth. There are other transmission lines that use other routes from other generation sources that could also help to supply and support the load.

A more complex question is whether GW “automatically triggers” load growth. Since the Public Utilities Commissions of Idaho and Wyoming must allow the utilities to pass on the capital costs of system improvements, including but not limited to GW, those commissions prohibit “speculative” construction and only permit capital improvements that show a clear demand ahead of construction. Therefore, a project like GW is in *response to*, rather than in anticipation of, load growth.

There is some concern that the mere presence of a competent grid that can manage current and future loads will incur further or greater growth than would occur without the grid in place. A large industrial facility, for example, if sited in the service area of either utility, could bring its own load growth and also bring direct and indirect employment that might increase local populations and therefore further increase load growth. In the absence of reassurances from the utilities that electrical supplies in the volumes needed by the industry would be available, the industry would locate elsewhere. While that is true for the grid as a whole, no individual project is responsible for the presence or absence of growth, because there are multiple paths along which such load demand could be satisfied. GW, in and of itself, is not required to meet such growth nor would it, by itself, trigger such growth.