

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

DOCKET NO. 08I-227E

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**IN THE MATTER OF THE INVESTIGATION OF  
ELECTRIC TRANSMISSION ISSUES**

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Leslie Glustrom a Colorado citizen and a Public Service Company of Colorado (“PSCo” or “Xcel”) ratepayer submits comments on electric transmission issues as part of Docket 08I-227E. This Docket was initiated by Commission Decision C08-0607 and additional comments were requested in Commission Decision C08-0821. These comments are submitted in accordance with Decision C08-0821.

I have the following short comments:

**1) Guidance on Noise and EMF Issues:** As other parties have noted, it would be extremely helpful to have Commission guidance and Commission Staff research on noise and EMF issues. In particular, it has been my experience that not enough attention has been paid to EMF issues (particularly the issue of potential health effects and appropriate levels of exposure) as various transmission lines have been reviewed. It is close to impossible for local landowners to participate in a meaningful fashion in PUC proceedings due to the large commitments of time and money that are required. This places additional burden on the PUC to take proactive measures to ensure thorough evaluation of noise and EMF issues to protect Colorado citizens and wildlife. We need to build significant number of new transmission lines in order to build the “New Energy Economy” and to decarbonize our electric supply. Let’s make sure we build this transmission infrastructure as well as we can so that inordinate costs are not borne by local landowners. Presently transmission dockets are being sent back for

review on issues related to noise and cost and this in itself is very costly both due to the cost of the proceedings and the delays in building the lines. With construction prices increasing rapidly, it would be good to get the issues of noise and EMF addressed clearly and well as soon in the process as possible.

**2) Beware of Being “Penny Wise and Pound Foolish:”** It has been my experience in various transmission dockets (e.g. 05A-072E and 07A-421E) that a tremendous amount of time is spent arguing over quantities of money that are, relatively speaking, really quite small. While \$20 million sounds like a lot to the average person, it is typically less than 1% of Xcel’s annual revenues. Since transmission lines will be amortized over many years (e.g. 20 or 30 years), \$20 million (or even \$80 million) is not that much money. Therefore, if it will make transmission lines a little less intrusive for those that need to live next to them, it will often be worth the investment as it will not have a large impact on ratepayers’ bills over the amortization period. In the long run, spending a bit more now to make transmission lines a bit more “palatable” can save money in the long run in avoided legal and public involvement battles.

**3) Early and Clear Notification of Potentially Affected Landowners:** Under State law, issues of noise and EMF are now settled at the PUC, yet the affected landowners often don’t know about transmission lines until it is too late for them to have meaningful involvement in the process. While Xcel typically sends a rather cryptic letter to local counties, this a) isn’t very informative for the counties who don’t have a strong understanding of the PUC process and b) seldom gets passed on to potentially affected landowners. The PUC should take proactive steps to ensure early and clear notification of potentially affected landowners so that they can have meaningful involvement and so that ultimately time can be

saved as routing and right-of-way decisions are made. Similarly, wildlife and environmental issues should be addressed as soon as possible in the siting process.

**4) Develop Sound Procedures for Community Wind and Solar Projects:** To date there has been considerable discussion of the benefits of “community wind” or “community solar” but it has been hard for the advocates of community wind to gain meaningful and effective access to the transmission process. Advocates of community wind from eastern Colorado or Lamar County find it hard to follow the transmission planning process and certainly travelling to Denver is a significant barrier to their involvement. In order to remedy this, it would be very helpful if Commission could direct Staff to study the situation with respect to community wind and to develop a set of procedures and recommendations that would allow community wind (and solar) to become realities instead of something that is just talked about but almost never actually executed.

**5) Develop Protective Policies to Avoid Using Transmission to Import Wyoming Coal:** There is considerable excess coal-fired capacity in Wyoming, and the Commission should take precautions to ensure that Wyoming’s coal-fired electricity is not being exported to Colorado as Colorado works to meet its goals for reductions in emissions of carbon dioxide.

Thank you for your consideration of these comments. Respectfully submitted this 15<sup>th</sup> day of August 2008.

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