



Department of Energy
Washington, DC 20585

20 April 2010

Mr. Derek Steenson
5 S. Garfield Avenue
Wenonah, NJ 08090-1812

Dear Mr. Steenson:

We have received your Motion to Intervene regarding the Champlain Hudson Power Express, Inc., project. However, your submittal did not include a signed original. To confirm your intervention, please mail or ship to us by overnight carrier the original version of your motion with your original signature.

Also, please provide your e-mail address so that we can conveniently and quickly communicate with you. If you e-mail (see below) to me the original electronic file from which you printed your intervention, I would then be able to access the footnoted hyperlinks included in your filing; they are not legible on the copies.

If you have any questions or concerns, please feel free to contact me either by e-mail at jerry.pell@hq.doe.gov or by phone (202-586-3362).

Very truly yours,

Dr. Jerry Pell, Ph.D., CCM
Principal NEPA Document Manager
Office of Electricity (OE-20, Room 8G-024)
U.S. Department of Energy
Washington, DC 20585

Derek Steenson
5 S. Garfield Avenue
Wenonah, NJ 08090

Motion To Intervene Pursuant To 18 C.F.R. § 385.214
In Order To Comment on the Application of
Champlain Hudson Power Express, Inc. (CHPEI)
for a Presidential Permit to Construct, Operate, Maintain,
and Connect an
Electric Transmission Line Across the United States
Border With Canada.

[I] Position Taken:

The Secretary should approve CHPEI's application.

[II] Movant's Interest:

I am a U.S. citizen and resident of the Eastern Seaboard. The Eastern Seaboard's energy supply is of interest to all those who reside therein.

This application is intertwined with the issues of national security and the United States Government's resource management. Said two issues are of such national importance

well.⁵ Encouraging clean energy production discourages coal-fired energy, and facilitating the growth of clean energy sources reduces the need for additional coal-fired plants. In turn, this zero sum effect helps to improve the health of both the fish and the people who live in and around the several bodies of water under which the HVDC cables will run.

NEPA. If granting the application is considered a major action⁶ then an adequate consideration of the factors required under 42 U.S.C. § 4332(C)(i) – (v) would come out in favor of granting the application. The environmental impact of granting the application would be minimal, especially in light of the context of the project's end result being to encourage clean energy in favor of coal fired energy, thereby reducing the global anthropogenic environmental impact.

The adverse effects related to the installation of the cables are acceptable in light of the ultimate goal of the project for which the application is sought. Also, CHPEI plans to use the least harmful method of submarine cable installation where the cable is buried under the sediment.⁷ The alternative, doing nothing, would ignore the growing energy demands of the target region⁸ and the nation⁹, and is therefore not a viable option. Granting the application would facilitate energy supplied by renewable sources which do not harm the environment. Finally, the only resources which would be committed, wind and water, are renewable.

5 **Who'll Stop the Mercury Rain?** U.S. News & World Report. Levine, Samantha 3-28-04.
<http://health.usnews.com/usnews/health/articles/040405/5mercury.htm> Accessed 4-1-10.

6 See *Winnebago Tribe of Nebraska v. Ray*, 621 F.2d 269 (8th Cir. 1980)

7 *Project Details*. Champlain Hudson Power Express: Project Development Portal. http://www.chpe.com/000_pdp
Accessed 4-2-10.

8 *New York City Energy Policy: An Electricity Resource Roadmap*. Bloomberg, Michael R 2004.

http://www.nyc.gov/html/om/pdf/energy_task_force.pdf Accessed 4-2-10. "The City has adequate energy resources for its electricity needs today, but the margins necessary for reliability are extremely thin. And the growth of demand for electricity in the City continues to be strong, even in the face of a weakened economy."

9 *International Energy Outlook 2009*. U.S. Energy Information Administration Independent Statistics and Analysis.
<http://www.eia.doe.gov/om/iew/world.html> Accessed 4-2-10. "In the IEO2009 projections, total world consumption of marketed energy is projected to increase by 44 percent from 2006 to 2030."

Conclusion. CHPEI's proposed project would help satisfy the energy demands of the Northeastern Seaboard in an environmentally conscious manner. Therefore, the application should be granted.