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To: <psscal@utah.gov>
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Subject: Utility Facility Review Board DOCKET #10-035-39
Attachments: DETAILED COST ACCOUNTING 100512.doc; MORALLY RESPONSIBLE BEHAVIOR 100512.doc

IN AN EFFORT TO ENSURE THAT THE RECORD IS AS COMPLETE AS POSSIBLE, I AM ATTACHING A WRITTEN SUMMARY OF MY VERBAL TESTIMONY YESTERDAY

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DETAILED COST ACCOUNTING

When I consider building a house or a building, I routinely ask the contractor for a detailed cost estimate. Sometimes a builder will respond 'oh it will cost approximately \$x per square foot.' Sometimes the builder will return with a detailed cost estimate that shows the number of studs required, the number of toilets, the number of electrical outlets. It has been my experience that the builder who provides the detailed estimate is almost always the better builder and almost always his estimate turns out to be closer to the actual final costs.

As a land-owner, I have been approached in the past by the power company. They requested that I grant them a right-of-way over a certain parcel of property. They showed me their drawings and asked what I considered a fair price for the property of mine that they would be using. We discussed the issues and came to an agreement. Freely, openly and with no coercion on either side.

In this case of the Mona to Oquirrh power line, I have seen the power company behaving in an entirely different manner. They have not approached me as a land owner and asked me what I thought. When their project was brought to my attention by concerned neighbors and others, I told them that I thought it wrong to run an industrial project through a residential area. Their response was not 'we recognize that and are willing to pay you the reasonable fairmarket value of all you land that will be affected by our project.' No, instead they proceeded to go through a political process that seems designed to force me to allow their industrial project to pollute my residential and recreational ground. Their bad faith actions led me to question further.

When I asked why they simply did not follow a better route – along the west side of Tooele Valley (or through Skull Valley) and then west along the I-80 corridor, one of the responses they gave was that it would cost them some \$40 million more to go there than along the edge of Tooele City. How, I wondered, could it be so much more expensive to run a few more miles over flat ground instead of over mountains and canyons? How, I wondered could it be so much more expensive to run along existing roads than to cut and maintain new roads in the mountains? How, I wondered could it be more expensive to purchase flat pasture ground out in the county, than some of the best residential ground right next to the city? I do not know for sure, but my assumption is that the power company has made the "\$x per square foot" type of an estimate and concluded that two lineal miles is more expensive than one.

Now a power line is a whole lot more expensive than a house or a building. I would think that their cost estimates should be of the very best kind. They should be detailed. They should list every tower and the length and type of wires. They should list the ground or rights-of-way to be acquired and their best guess at fair market values. Yet, I have seen none of those estimates. There ought to be such an estimate for each and every mile of each and every alternative route that has been considered. In the days of electronic spreadsheets, such analysis only takes a moment. It is easy to lay out your estimates so that everyone concerned can review and evaluate them.

And, I would not expect that the construction cost alone to be enough. A critical factor in the total cost of a commercial building are the annual operating costs. In a time of increasing heating costs, it quickly

becomes important to consider the value of spending more money up front to add insulation so that those heating bills will be lessened over the building's life. In a similar manner, I would expect it to be critical to consider the costs of transmitting power over a higher or a lower voltage powerline. I understand that it is much less expensive on a per unit basis to operate a higher voltage line than a lower voltage line. So I would ask – why does it make sense to split the 500kv line at the south end of Tooele Valley instead of running it all the way to the Terminal substation? It would seem to me to be the least costly way, operationally, to connect Mona and P_____ (their terminal up in Idaho that they want to connect with).

And besides voltage, how about liability for proximity to humans and their homes? Or the cost of maintaining mountain roads instead of using existing state roads? Or the likely maintenance costs when building across earthquake faults and in areas of high winds? All the issues should be considered and a reasonable range of costs listed. It is not hard, it is simply the way to do things. And when a builder doesn't want me to see his detailed cost estimate, I usually suspect that he hopes to charge me more than it is actually going to cost him to build the building.... And when the power line company tells me that it will cost \$40 million more to take a route that they don't prefer, I suspect that there are other issues that they do not wish to talk about or that they simply have not done the work that they ought to have done.

If someone is serious about finding the best possible route for a power line, I believe that they should have detailed cost accounting for each and every alternative route. I have been told that RMP has spent millions of dollars over many years to analyze these alternative routes. But I have not seen the evidence that they have done a good job.

MORALLY RESPONSIBLE BEHAVIOR

Were a gun owner to leave his loaded pistol on a sofa where children could reach it and play with it, would we not consider it morally irresponsible (if not criminally wrong)?

If a power line company were to build a high voltage transmission line where people live and play is it not as morally wrong?

We never hear how many times a gun or guns are left within the reach of children. We only hear of the occasions when a child has actually picked up the gun and someone has been injured.

In a similar manner, we never hear of all the risks a powerline brings to the people who live and play nearby, we only hear of those occasions when the harm has happened and it can be legally proved.

Common sense tells us that leaving a lethal weapon in the reach of children is morally wrong.

So common sense tells us that building a high voltage power line where people live and play is wrong.

We may not see any immediate harm. But we do know that the incidence of childhood leukemia increases. We hear of other health issues. There was recently a decision against a power company in Michigan for harm done to a herd of dairy cattle – calves were born deformed and more....

Let us be morally responsible and keep our guns out of the reach of children and our powerlines as far as possible from our residential and recreational areas.

(And for the power company to insist that Tooele citizens ought to pay for relocating the line away from existing homes and residential areas is as ridiculous as it would be for a gun owner to insist that someone else pay for his gun safe before he should have to keep his gun off the couch.)