



April 29, 2010

David Navecky
STB Finance Docket No 35095
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Re: Comments on DEIS Alaska Railroad Corporation Construction and Operation of Rail Line Extension to Port MacKenzie, Alaska

Dear Mr. Navecky:

Matanuska Electric Association, Inc. (MEA) hereby submits its comments on the above referenced Draft Environmental Impact Statement. MEA is the public utility certificated by the State of Alaska to provide electric utility service to Port MacKenzie and the geographic area within which all build options evaluated in this DEIS are located. For the reasons discussed below, this project is likely to impact MEA's ability to provide reasonably reliable and affordable electric utility service in the affected area. MEA proposes herein mitigation for this impact.

As noted in the DEIS, construction of the proposed rail line extension to Port MacKenzie will result in additional development in the Port area. See, DEIS Section 2.1.1.10. MEA currently serves bulk commodity conveyor belts in other parts of its service territory that require up to 1,000 kW of energy per drive motor. Bulk commodity conveyor belts can cause electric system wide voltage fluctuations unless the system providing electric utility service to them is extremely robust.

Currently, MEA's distribution service to the Port MacKenzie area is one three-phase feeder. With the load increases caused by the new Goose Creek Correctional Center and related infrastructure, MEA is planning to further upgrade service through construction of a new substation in the Port area with 115 kV sub-transmission service from Teeland Substation near Wasilla and a 230 kV tap into the existing Chugach Electric Association, Inc. (Chugach) transmission line from Beluga Power Plant. These upgrades should ensure that there is adequate capacity to serve foreseeable Port area loads, but additional voltage support could still be required to meet service quality standards for large fluctuating loads such as bulk commodity conveyor belts.

Additionally, service to the Port area would be almost entirely dependent upon the Chugach transmission line from Beluga Power Plant to Teeland Substation being operational. In just the past year, migration of the Susitna River has taken that transmission line out of service for an extended period of time. It is likely that future service interruptions will occur given the remote area through which this Chugach transmission line is located.

MEA believes that more reliable and better quality service could be provided to the increased electric load that will be developing in the Port area, partially as a result of the rail line extension project, if provision was made for direct transmission and sub-transmission

interconnections between the new Port MacKenzie area substation and the Alaska Intertie at Douglas Substation in Willow. This would improve service to the Port area by providing better access to the generation resources owned by Golden Valley Electric Association in Healy, Fairbanks, and North Pole.

As noted in Section 13.1.4.1 of the DEIS, current land ownership in the subject area is complex. The Alaska Railroad Corporation (ARRC) proposes to acquire a 200' wide right-of-way for this project, which includes space for an above ground power line. See, Section 2.1 and Figure 2-1 of the DEIS. Further, as noted in Sections 2.1.1.1 and 2.1.1.2 of the DEIS, the Alaska Railroad Corporation (ARRC) will be clearing vegetation from virtually the entire right-of-way and will be constructing an access road along the rail line. Unified land ownership, access roads, and vegetation cleared for other purposes will make the rail line route an ideal location for construction of the needed transmission and sub-transmission interconnection between the Port area and Willow.

MEA is not seeking a requirement that the ARRC build the needed transmission and sub-transmission interconnections. Nor is MEA seeking a requirement that the ARRC issue MEA an easement for construction of this transmission and sub-transmission interconnection within the right-of-way that the ARRC has not yet acquired. However, MEA does believe that the FEIS should include an analysis of the impacts of the transmission and sub-transmission interconnection lines, in addition to the distribution power line that is shown in Figure 2-1. Construction of these interconnections in or immediately adjacent to the ARRC right-of-way is clearly a foreseeable consequence of any build option selected.

To facilitate this analysis, MEA has attached hereto a revised Figure 2-1 for utilization in the FEIS that includes a typical pole that would serve the long-term needs of project area. This typical pole would be capable of holding a 230 kV transmission line circuit, a 115 kV sub-transmission circuit, and a nominal 25 kV three-phase distribution circuit. MEA has also attached for your reference a modified version of DEIS Figure S-1 showing existing and planned electric transmission and sub-transmission systems. Questions related to this pole design and routing requirements can be directed to MEA's Director of Engineering, Gary Kuhn.

Sincerely,



E. Joe Griffith
General Manager

Attachments



