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Comments: Comments of Sue D. Sheridan

Hermosa Critical Minerals Project #65668 - proposed UniSource transmission line

June 10, 2024

Dear Forest Service,

I am writing to comment on a transmission line proposed to be built by UniSource in connection with the Hermosa Mine project in the Patagonia Mountains of southern Arizona.

I have been a frequent guest at the Circle Z Ranch near Patagonia, and am an electricity policy lawyer. I served for many years as lead energy counsel to the Committee on Energy & Commerce in the U.S. House, and in that capacity worked on several amendments to the Federal Power Act. I've taught electricity law and policy courses at the George Washington University Law School and Columbia University's School of International Policy Affairs. I also represented clients from both the investor owned utility and public power sectors through my consulting firm.

While I am not familiar with every detail of UniSource's transmission line proposal, I've followed the debate over whether this would be the best way to supply electricity to the mine. I would like to offer two considerations rooted in my broad experience:

(1) Utilities and other transmission builders have real financial incentives to overbuild transmission capacity. Often the needs of a new customer, such as the mine, can be served by increasing the load carried by existing transmission lines over established rights of way.

- I'd bring to your attention a pertinent report recently released by Gridlab:

https://www.2035report.com/wp-content/uploads/2024/04/GridLab_2035-Reconductoring-Technical-Report.pdf. This report examines the potential for increasing the capacity of existing lines by "reconductoring" them, e.g. deploying more efficient line technology.

(2) As I'm sure you know, part of the analysis utility regulators conduct is whether the benefits of a new transmission line would be "reasonably commensurate" with the costs to particular customers. I recognize that the responsibility for projecting and approving such costs does not fall to the Forest Service, but I think consumer cost is a factor the Forest Service should be aware of when analyzing possible alternatives to a building a new line along a new right of way on Forest Service land.

I've seen many transmission proposals become stalled for years over routing issues when environmental quality could be undermined. Certainly construction of a large transmission line along the route proposed by UniSource would degrade the existing the recreational and visual purity of the area. As a horseback rider who has enjoyed the unspoiled character of the region that would be forever altered by the proposed line, I urge the Forest Service to thoroughly consider the need for a new transmission project through this lovely, unspoiled country.

Fo these reasons, I urge the Forest Service to bear in mind the possibility that a less intrusive, less expensive,

and less controversial solution may be available to meet the needs of the Hermosa Mine.

Respectfully yours,

Sue D. Sheridan
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