

**UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
BEFORE THE
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY**

In the Matter of:)
)
Application for Proposed Project)
for Clean Line Plains & Eastern) OE Docket No. TPF-01
Transmission Line)

**PETITION FOR DELAY IN DOE REVIEW PENDING RULEMAKING
on behalf of
BLOCK PLAINS & EASTERN CLEAN LINE**

BLOCK Plains & Eastern Clean Line: Arkansas and Oklahoma (hereinafter “BLOCK Clean Line”), hereby submits this Petition for Delay in DOE Review Pending Rulemaking in the above-captioned proceeding. BLOCK Clean Line simultaneously submits Petitions for Extension of Comment Period Deadline, Petition for Public Hearings, Petition for Contested Case, and Motion for Intervention. BLOCK Clean Line notes that a repeated fatal flaw in the DOE’s process is that there are no rules under which it may proceed toward a decision on this Application. A Petition for Rulemaking is being submitted to the Federal Energy Regulatory Commission and is attached. BLOCK Clean Line requests a delay in review of this transmission project until rules have been promulgated for DOE review.

Clean Line Energy Partners, LLC, have submitted an application for its Plains & Eastern Clean Line Project through Arkansas and Oklahoma under §1222 of the U.S. to authorize a project under §1222 of the Energy Policy Act of 2005 (EPA Act), the DOE must determine that a proposed project satisfies statutory and other criteria, as set forth in the Notice of Application, page 23520, et. seq, of the Federal Register dated April 28, 2015. However, the

DOE's Office of Electricity Delivery and Energy Reliability can provide no authority for its criteria or process -- the DOE's criteria and process has no basis in rules. Given that serious procedural flaw, the review of this project should not go forward.

The Department is aware of the lack of and need for Section 1222 rules. As of late April, DOE's Office of Electric Delivery and Energy Reliability has begun the drafting process for Section 1222 rules, with no decision as to whether it will proceed under formal or informal rulemaking, and no schedule is available. A Notice list has been established for this rulemaking.

BLOCK Clean Line requests a delay in review of this transmission project until rules have been promulgated.

Respectfully submitted,



Dated: June 8, 2015

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