



National Caucus of  
Environmental Legislators

Dear Chairman Phillips and Commissioners Christie, Rosner, See, & Chang,

As state legislators, we work to protect our constituents' access to safe, reliable, and affordable electricity in line with our state energy policies. The Federal Energy Regulatory Commission's work ensuring just and reasonable wholesale electricity and transmission service rates is vital to our efforts.

As the Commission has described in its Advanced Notice of Proposed Rulemaking (ANOPR), dynamic line ratings (DLR) can often be applied to find increased transmission capacity at low cost. Increasing the capacity on the grid can also allow lower-cost power to be delivered, saving millions of dollars. [PPL Electric Utilities](#) reports that DLR on two lines saved over \$60 million in congestion year-over-year, and is projected to resolve over \$23 million in annual congestion in 2025. Addressing these constraints also improves economics for the lowest-cost energy sources by supporting competition and potentially expanding development.

DLR also supports grid reliability by monitoring line temperature and sag, allowing operators to identify reliability and safety risks on critical spans. Some DLR tools can measure temperature anomalies along a line to detect wildfires and other faults.

Utilities forecast significant load growth in the coming years. This should be good news for our constituents – clean and efficient electric vehicles and devices will replace older models, and new industries will create new jobs. However, it will be hard to build new infrastructure for new electricity demand while maintaining low rates. We must get the most value out of the grid we have.

While we hope that all utilities are always using appropriately conservative line ratings, many DLR pilots have found that some small percentage of lines may be operated above their carrying capacity. As pressures on utilities to integrate large loads quickly mount, they may be inclined to adjust their line rating assumptions about wind speed or conductor properties to increase the lines' carrying capacity. With the transition to Ambient Adjusted Ratings per Order 881, the utilities will already be using forecast temperature alongside these assumptions. If they instead use DLR, they will be able to use the line to its true capacity and maintain safety without any increased risk.

However, investor-owned utility incentives around line ratings are not fully aligned with customer incentives. The bigger challenge is that utilities are not compensated for increasing grid capacity except if it means integrating new load. On a line that is simply blocking the delivery of low-cost power, the utility is only incentivized through its return on equity business model to address the constraint if it represents a large capital project.

We therefore encourage the Commission to continue work on a requirement to deploy DLR on highly congested thermally-limited lines along the lines of the ANOPR. Evidence in the ANOPR as well as proposals from the [PJM Interconnection](#) and the [WATT Coalition, American Clean Power Association, Advanced Energy United, and Solar Energy Industries Association](#) indicate ripe opportunity. DLR deployments on highly congested lines would have great cost-savings and reliability value. DLR enables delivery of low-cost resources and ensures the system isn't artificially limited. We also encourage the Commission to continue the investigation of incentive structures that would orient utilities towards maximizing transmission capacity using grid enhancing technologies where they would be cost-effective.

Signed,

Alaska Representative Zack Fields  
(AK-17)

Alaska Representative Andy Josephson  
(AK-13)

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Wisconsin Representative Supreme Moore  
Omokunde  
(WI-17)

Wisconsin Representative Shelia Stubbs  
(WI-77)