



# NCEL

National Caucus of  
Environmental Legislators

October 4, 2023

The Honorable Willie L. Phillips, James Danly, Allison Clements, and Mark C. Christie  
Commissioners  
Federal Energy Regulatory Commission  
888 First St, NE  
Washington, DC 20426

Dear Acting Chairman Phillips and Commissioners Danly, Clements, and Christie,

We are writing to urge the Commission to strengthen and finalize its regional transmission planning rule. The headlines from this summer of drought, floods, storms, and extreme heat have threatened grid instability constantly; however, [the grid has beaten the odds](#) time and time again due to the widespread adoption of renewable energy. In order for this trend to continue, it is critical that the power from renewable energy has the means to reach the areas that need it the most. So far, transmission build out has been woefully unprepared to meet that need.

We as state legislators work diligently to ensure that our constituents have reliable, affordable, and clean electricity. Under the Federal Power Act these resource choices are left to states and we take this important responsibility seriously. Our efforts are buoyed by the funding created by the Inflation Reduction Act. However, studies have shown that [80% of the value of the IRA will not be realized without transmission expansion](#) and to unlock the full emissions reduction potential of the Inflation Reduction Act, the pace of transmission expansion must more than double the rate over the last decade.

This is not only a clean energy issue, but an economic one as well. In the Eastern US alone, expanding and modernizing the transmission grid [would unleash up to \\$7.8 trillion](#) in investment and generate more than 6 million net new jobs, primarily in rural areas. Expanded transmission is also critical for increasing reliability of the grid, something we hear from our constituents daily. Our states suffered the impacts of Winter Storm Elliott and are determined to provide our [grids with the diversity of resources](#) needed to keep the lights on.

Finally, transmission expansion is critical to advancing environmental justice for our most vulnerable communities. By creating the infrastructure necessary to transmit clean energy across the country, it will be easier to [transition away from the dirtiest fossil fuel plants](#) that disproportionately pollute communities of color and low-income communities.

It is critical that the transmission system continue to support so many aspects of modern American life at home and at work. Therefore, we are writing to urge the Commission to finalize its regional transmission planning rule in Docket No. RM21-17.

The planning rule should require four key features:

1. The multiple benefits relevant in the Federal Power Act need to be incorporated. Putting benefits into silos and ignoring many of them has contributed to the lack of transmission, causing congestion and interconnection queue logjams. Successful experiences with transmission such as MISO's Multi-Value Projects incorporated multiple benefits including reliability, not just congestion or public policy alone.

2. A mechanism to resolve disagreements between states on cost allocation. We appreciate the role of states in the proposal and also recognize cost allocation disagreements can be a barrier.
3. Plan for the future load and resource mix. Our constituents will be left vulnerable if planners continue to ignore all of the available projections and information about a changing resource mix. Growing load from national efforts to bring manufacturing back to the US and plans to electrify transportation and other sectors also needs to be incorporated to create a realistic picture of future needs.
4. Incorporation of advanced transmission technologies. High-performance conductors, dynamic line ratings, topology optimization, and power flow control are all examples of ways to deliver more power over existing rights of way and transmission assets. Consumers and those impacted by new rights of way deserve to know that maximum use of existing assets is being pursued before new rights of way and expensive lines are planned.

We appreciate the efforts of Order 2023 on interconnection and understand there is more work for the Commission this fall and into next year to fully finalize and implement that order. But that order does not address the underlying transmission capacity constraints that will continue to limit economic growth, reliable service, and development of a sustainable resource mix. We recognize there is a very large record for the Commissioners and staff to process in this docket prior to issuing a final rule. We look forward to your response and action on this important rule.

Signed,

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(AL-83)

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(AK-17)

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(AK-2)

Alaska Representative Andy Josephson  
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