



August 17, 2022

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Subject: Notice of Proposed Rulemaking, Federal Energy Regulatory Commission; Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection; 87 Fed. Reg. 26504; Docket No. RM21-17-000; (May 4, 2022)

Dear Secretary Bose:

The U.S. Chamber of Commerce and its Global Energy Institute (collectively, “the Chamber”) appreciate the opportunity to submit these comments on the Notice of Proposed Rulemaking (“NOPR”)¹ issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) on April 21, 2022. The NOPR builds upon the wealth of comments submitted to the Commission in response to its earlier issuance of a far-ranging Advance Notice of Proposed Rulemaking,² which teed up a number of inquiries and potential policy modifications concerning the broad transmission planning, generator interconnection, and associated cost allocation processes overseen by FERC.³ The NOPR narrows that focus through the solicitation of comments on potential reforms to the regionally focused electric transmission planning, cost allocation, and right of first refusal processes overseen by the Commission.

The refined NOPR appropriately limits its reach to a more manageable scope than that covered by the ANOPR, primarily setting forth proposed revisions to the regional transmission planning and transmission cost allocation processes that were

¹ *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection* 179 FERC ¶ 61,028 (2022) (published in the Federal Register at 87 Fed. Reg. 26,504 (May 4, 2011)).

² *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, 176 FERC ¶ 61,024 (2021) (published in the Federal Register at 86 Fed. Reg. 40,266 (July 27, 2021)) (“ANOPR”).

³ The Chamber submitted comments responsive to the ANOPR, which are available at: <https://www.globalenergyinstitute.org/us-chamber-comments-fercs-transmission-anopr>

most recently formulated as part of FERC's Order No. 1000 series of rulemakings.⁴ Since the issuance of the NOPR, FERC has proposed a second rulemaking – with a separate and subsequent comment period – to evaluate potential reforms to the Commission's electric generator interconnection procedures and agreements.⁵ This now bifurcated proceeding focuses upon the improvement of the associated queuing and study processes applicable to generator interconnection requests, along with potential improvements to the cost allocation methodologies relating to upgrades necessary to support newly interconnecting generation. Comments and reply comments in this related but now separated proceeding (Docket No. RM22-14-000) are slated to be due on October 13, 2022, and on November 14, 2022, respectively.

Notwithstanding their separation, the proposals set forth across both the NOPR and the Interconnection NOPR represent significant undertakings to reassess and potentially restructure many of the most significant policies and procedures within FERC's electric regulatory jurisdiction. Many of these policies and procedures have been crafted through various rulemakings and numerous case law developments over almost two decades. As such, the Commission should be mindful of the gravity of these undertakings and their potential to unleash unintended consequences that could significantly impact both the reliability and the cost of electricity for businesses and consumers across the country. Thus, it is important that the Commission consider the input of all impacted stakeholders, including the manufacturing, commercial, and other electricity-consuming sectors of the economy that stand to be the most impacted by even small price increases resulting from any forthcoming transmission planning reforms. Many of the policies and procedures touched upon in the NOPR have largely served their intended purposes, and therefore they should not be abruptly jettisoned without a thorough evaluation of the costs and benefits stemming from significant changes in FERC transmission policy.

The mission of the Chamber's Global Energy Institute is to unify policymakers, regulators, business leaders, and the American public behind a common-sense energy strategy to help keep America secure, prosperous, and clean. These comments intend to provide the overall business community's input to the Commission as it considers specific modifications to the policies and procedures governing the regional planning, cost allocation, and expansion of America's interstate electric grid.

⁴ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 61,051 (2011), order on reh'g, Order No. 1000-A, 139 FERC ¶ 61,132, order on reh'g and clarification, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

⁵ *Improvements to Generator Interconnection Procedures and Agreements*, 179 FERC ¶ 61,194 (2022) (published in the Federal Register at 87 Fed. Reg. 39,934 (July 5, 2022)) (the "Interconnection NOPR").

I. Background

Along with our members from across the economy, the Chamber is a leading national advocate for the development of the modern infrastructure necessary to maintain America's global competitiveness while supporting the reduction of greenhouse gas emissions as quickly as is supported by technology. Along these lines, infrastructure planning and permitting must also be designed to facilitate – rather than unduly delay – the siting and construction of the necessary energy infrastructure critical to meet these objectives. Electric transmission lines and lower carbon generation resources are two of the most important types of new infrastructure that will be essential to the United States meeting its carbon reduction goals. The Commission must ensure that its potential future actions serve to enhance collaboration and cooperation among the Commission and the many other state and federal agencies necessary to bring needed energy infrastructure improvements into existence. Any approach that fails to recognize the value of enhanced state/federal partnership on transmission and generation development is unlikely to succeed in the ultimate goal of putting more steel in the ground. As such, the Chamber commends the NOPR for recognizing the indispensable role that relevant state entities play in the transmission planning process, especially with respect to the cost allocation of regional transmission projects.⁶

The Chamber also supports the Commission's continuing engagement with its Joint Federal-State Task Force on Electric Transmission (the "Task Force"). The Task Force, which is comprised of FERC's commissioners and a broad cross-section of state public utility commissioners, met most recently on July 20, 2022, to discuss the overarching topics subject for comment in the NOPR.⁷ The obstacles that arise to large-scale transmission and energy resource development often stem from a disconnect between Federal and State oversight of the power grid and differing cost/benefit calculations underlying the need for expansion. Given current realities and the likely continuation of shared siting authorities, transmission planning activities aimed at the enlargement of the transmission grid to integrate significant levels of new zero- and low-emission generation resources will require the continued engagement of state regulatory bodies with grid planners and owners to identify and effectuate shared goals for infrastructure development. The Chamber believes that the ongoing engagement of the Task Force should pay dividends through the alignment of mutually held State and Federal interests.

⁶ NOPR at PP 302-318.

⁷ <https://www.ferc.gov/media/fourth-meeting-notice-meeting-and-agenda>

II. Regional Flexibility Remains Key to Transmission Planning Progress

Consistent with the comments the Chamber provided in response to the ANOPR, regional flexibility with respect to transmission planning and cost allocation remains a paramount concern. Certain of the transmission planning reforms proposed within the NOPR are quite prescriptive, such as the construct of the new long-term regional planning processes and long-term scenario development and reassessment processes. As we noted in response to the ANOPR, it is critical for FERC to recognize that efforts to expand transmission facilities to facilitate *potential* yet currently *unplanned* generation resources tread into the generation resource planning authority traditionally overseen by state regulatory authorities. With forty-nine such regulators within the contiguous United States, the recognition and endorsement of regional differences will be essential to ensuring that FERC and state-level regulators can productively partner in the development of the lower-carbon energy grid of the future. Rigid 20-year planning horizons, for example, may not be equally appreciated by different state regulators and similarly may also not mesh well into established transmission planning procedures within both organized and vertically-integrated markets.

The interstate power grid subject to FERC's jurisdiction includes a conglomeration of different business models and market structures. This mix includes investor-owned utilities, municipal, public power, and cooperative electric providers, which can be members of RTOs, independent system operators (ISOs), power pooling arrangements, joint-ownership agreements, or subject to traditional vertically-integrated structures. Moreover, these different industry stakeholders operate in different states, with diverse geographies, varied state policy goals, and subject to a variety of state regulatory structures and cost allocation frameworks. Further, even the larger RTO and ISO markets differ significantly as a result of decades of stakeholder input and continuing engagement aimed at ensuring that those markets operate efficiently and effectively within those market structures' shared federal and state oversight. The wholesale application of a new regional transmission planning regime across all of these various entities would ignore the finely-crafted compromises that make these markets function and provide benefits both to stakeholders and electricity customers today.

Along these lines, the Chamber appreciates the fact that the NOPR does not propose to modify Order No. 1000's requirements regarding existing reliability and economic planning guidelines.⁸ By definition, impactful regional transmission planning driven by reliability needs should not be unduly encumbered with additional planning requirements that could delay critical facility additions. With respect to reforms to policy-driven planning and transmission projects driven by changes in resource mix and demand, it remains important for the Commission to avoid any one-size-fits-all dictate

⁸ NOPR at P 3.

to modify the transmission planning requirements of Order No. 890 and Order No. 1000. Instead, FERC must accommodate, from its inception, needed regional differences. Even though the stakeholder processes in place to manage change within different market structures may not always operate as swiftly as some market participants would prefer, the enhanced analysis and discussion inherent in these efforts typically ensures that unintended consequences are avoided, rather than first discovered, during policy implementation.

III. Measured Enhancements to Regional Planning Can Be Beneficial

The NOPR concludes that existing regional transmission planning and cost allocation efforts fail to sufficiently assess long-term transmission needs, inadequately account for known drivers of transmission relating to changes in demand and the generation resource mix, and omit consideration of the broader benefits and beneficiaries of regional transmission facilities planned to meet those long-term needs.⁹ To rectify these perceived shortcomings in existing regional transmission planning processes, the Commission proposes to require that transmission providers:

- (1) [I]dentify transmission needs driven by changes in the resource mix and demand through the development of long-term scenarios that satisfy the requirements set forth in this NOPR;
- (2) [E]valuate the benefits of regional transmission facilities to meet identified transmission needs driven by changes in the resource mix and demand over a time horizon that covers, at a minimum, 20 years starting from the estimated in-service date of the transmission facilities; and
- (3) [E]stablish transparent and not unduly discriminatory criteria to select regional transmission facilities in the regional transmission plan for purposes of cost allocation that more efficiently or cost-effectively address these transmission needs driven by changes in the resource mix and demand.¹⁰

On their face, the concepts set forth in these proposed reforms are not objectionable. For one, the concept of long-term planning is not a new one, and it is generally a laudable goal. However, the Commission must recognize that as planning horizons grow more distant, the quantity and quality of the assumptions necessary to complete such long-term plans both increase and decrease, respectively. Transmission providers do have many tools to undertake longer-term planning of the regional

⁹ NOPR at P 47.

¹⁰ NOPR at P 56.

transmission grid, but a binding process that designs transmission system additions based on 20-year-plus planning horizons is likely to result in a transmission grid that either under- or over-shoots the grid needs that materialize two decades into the future. Quite simply, today's power grid and the influx of renewable generation resources was not forecast at the turn of the century. Thus, forecasts made today of equivalent length are more likely than not to miss the mark as many potential future generation technologies (e.g. long-term battery storage, small modular reactors, carbon capture and sequestration for new or existing fossil units, etc.), while promising, are not yet certain to materialize in widely commercialized form under a currently known timeframe.¹¹

While more transmission is typically a good thing for system expansion and the facilitation of a lower-carbon energy sector, the Commission must be mindful of the reality that industrial, commercial, and residential electricity customers will all be asked to share in the cost of this future grid. The alignment of costs and benefits is far less certain in twenty years than can be ascertained over the next five or ten years. Moreover, given the NOPR's proposal that the 20-year time horizon commence from the in-service date of the identified transmission facilities, the effective time horizon proposed is closer to 25-30 years in the future, thereby further increasing the uncertainty of long-term regional transmission planning. Thus, while longer-term planning can be informative as transmission expansion decisions are made, it would be inappropriate to use long-term scenarios as forcing mechanisms to build more transmission or as outcome determinative transmission expansion plans. In the alternative, the Commission should consider establishing the 20-year time frame as a ceiling, rather than a floor, consistent with the far end of most state planning horizons. This change would protect transmission planners from being forced to plan beyond the requirements of applicable state law.

The Chamber supports the NOPR's proposal to generally retain some or all aspects of the existing regional transmission planning and cost allocation processes utilized to consider transmission needs driven by public policy requirements, and its proposal to incorporate enacted state and/or federal laws that impact future resource mix decisions into the development of long-term scenarios.¹² Public policy-driven transmission planning is ongoing across regions and need not be entirely revised, but the consideration of enacted laws likely to have an impact on the future resource mix makes sense and should be a part of such regional planning. In addition, the Chamber views as crucial the incorporation of "state-approved utility integrated resource plans,"

¹¹ The NOPR expressly recognizes that while system conditions are reasonably predictable in the short term, "as the transmission planning horizon extends further into the future, they become increasingly imprecise." NOPR at P 87.

¹² NOPR at P 73-74.

or state-specific equivalent, in the development of long-term scenarios.¹³ It is important that the development of multiple long-term scenarios not undermine the requirement that transmission plans be consistent with applicable state resource plans.

When transmission projects continue to reveal themselves across multiple future scenarios, whether driven by demand growth, interconnection requests,¹⁴ or otherwise, it makes sense to give these projects a hard look as they may very well provide multiple future and flexible benefits that will justify their associated cost implications. Likewise, the proposal to develop at least four “plausible and diverse”¹⁵ long-term scenarios with “best available data”¹⁶ should provide the necessary information to identify the transmission projects that will predictably stand the test of time and remain used and useful as the now uncertain future composition of the electric grid materializes over the decades to come. Requiring that one of these four scenarios account for high-impact, low-frequency events, however, may be a bridge too far given the seemingly infinite variety of scopes and impacts that wildfires, storms, and/or a hostile cyber attack could take on any transmission provider’s grid.¹⁷ If the facilities impacted by such events could be readily identified, efforts to harden these grid components would likely already be underway. On the other hand, the optional ability for transmission providers to identify specific geographic zones within their transmission planning region that have the potential for large-scale new generation development is unobjectionable, particularly due to its voluntary nature.¹⁸

IV. Flexibility in the Evaluation of Benefits is Welcome

In response to many commenters’ assertion that the consideration of benefits from new transmission facilities should be broadened, the Chamber welcomes the NOPR’s proposal to decline to prescribe any particular definition of “benefits” or “beneficiaries” or to require the use of any particular benefits in the assessment of new regional transmission facilities.¹⁹ Instead, we strongly support the concept of regional flexibility to determine the appropriate benefits to consider in justifying particular regional transmission projects. Such flexibility in the consideration of benefits will enable regions to consider those benefits that best align with their applicable market structures, as certain benefits calculable within RTO/ISO market structures simply may not translate to more traditionally regulated markets. As such, a rigid list of benefits to consider simply would not work. The Chamber does support the use of metrics within cost-benefit analyses for long-term transmission planning that are quantifiable, non-

¹³ NOPR at P 104.

¹⁴ NOPR at P 166.

¹⁵ NOPR at P 123.

¹⁶ NOPR at P 130.

¹⁷ NOPR at P 124.

¹⁸ NOPR at P 145-153.

¹⁹ NOPR at P 183.

duplicative, capable of replication, and forward looking. The objective nature of such benefits should mitigate some of the uncertainty that otherwise results from the projections of benefits over multiple future decades. Substantively variable benefit metrics would only accentuate the potential for variability and error in these calculations.

The Chamber also supports the NOPR's proposal for transmission providers to establish criteria for the selection and evaluation of benefits that "seek to maximize benefits to consumers over time without over-building transmission facilities."²⁰ As we stated in our comments responsive to the ANOPR, while the Chamber supports a more holistic transmission planning paradigm, it is critically important that the Commission not take a blind "build it and they will come" approach to transmission grid expansion. Thus, it is welcome to see NOPR language recognizing that transmission over-build should be avoided.

The Chamber fully supports the buildout of new transmission infrastructure and strongly believes that more transmission is the key to integrate new sources of energy and lower the delivered price of power, all while enhancing reliability. However, transmission does come at a cost, and the physical component prices and the permitting hurdles that must be cleared to build most new domestic infrastructure are all increasing. As such, Chamber members across all sectors of the economy will be asked to contribute to these expenses in the form of higher electricity rates. It is important that all stakeholders be mindful that an irrational transmission buildout could undermine the competitive advantage of domestic electricity rates as compared to those borne by industries in other countries, and particularly across Europe. The sacrifice of this competitive advantage would not only lead to lost jobs and economic growth, but would concomitantly lead to decreased electricity use and the assessment of system fixed costs upon fewer customers. This type of negative feedback loop should be avoided, and it is important that the Commission's regional planning reforms not perpetuate such a result.

V. Advanced Technologies Have Limits in the Transmission Planning Context

The ANOPR solicited comment on whether Grid-Enhancing Technologies should be considered in the evaluation of long-term regional transmission planning processes.²¹ In response to a variety of input, the NOPR now proposes to require that public utility transmission providers more fully consider as part of their regional transmission planning the incorporation into transmission facilities of dynamic line

²⁰ NOPR at P 242.

²¹ ANOPR at P 48.

ratings (DLR) and advanced power flow control devices.²² While advanced power flow control devices can be a reliable input to scope needed new transmission facilities, DLR does not have an appropriate place in transmission planning. To the contrary, DLR provides operational flexibility under normal operating conditions, but it does not provide respite in a worst-case scenario. In addition, there is also an associated cost for the monitoring required to operationalize DLR. Thus, it is incorrect to view DLR as a mechanism for obtaining “free” transmission capacity. Only physical transmission capacity can provide relief in adverse operating environments and extreme system conditions, and both “real” and “virtual” transmission capacity come with associated costs. Thus, while DLR is an appropriate tool for transmission operations, it should not be used as a reason to bypass the planning and development of otherwise necessary new regional transmission facilities.

VI. State Involvement and Buy-In on Cost Allocation is Key

The Chamber strongly agrees with the broad range of stakeholders that recognize that cost allocation is critical to the successful development of more efficient and cost-effective regional transmission facilities.²³ This is also an area where state involvement is critical, because as the Commission appropriately recognizes, regional transmission facilities face significant uncertainty and risk of achieving fruition when state regulators do not perceive a proposed new transmission facility’s value to be commensurate with its associated costs.²⁴ Nevertheless, the NOPR’s primary focus on the *ex ante* development of long-term regional transmission cost allocation methods risks putting the cart before the horse.²⁵

Given the wide variety of regional transmission projects that can be proposed, and the indisputable fact that such projects will have variable levels of impact and benefits across the states covered by any particular transmission planning region, the concept of a one-size-fits-all cost allocation method for such a region is highly unlikely. State utility regulators would risk accusations that they are not adequately protecting their relevant constituents if they were to agree to a cost allocation process that assessed a fixed level of costs on ratepayers regardless of the design and/or associated benefits of any specifically proposed regional transmission facility. The Commission’s goal should be to avoid the imposition of costs upon customers for facilities that are either unnecessary or not used and useful for such customers. State commissioners share this goal. An *ex ante* long-term regional transmission cost allocation method

²² NOPR at P 272.

²³ NOPR at P 288.

²⁴ NOPR at P 297.

²⁵ NOPR at P 302.

would essentially deny state commissioners of this vital role in the utility ratemaking process.

Therefore, the “State Agreement Process” is overwhelming likely to become the default path to allocate the costs of new regional transmission facilities. Of course, essentially consistent with its definition,²⁶ the results of such processes are undefined and unpredictable and therefore will not provide the type of enhanced certainty and clarity that are needed to facilitate the siting and construction of new regional transmission facilities at the state level. Thus, project-specific state buy-in will remain a hurdle to the rapid and broad expansion of regional transmission grids. However, the Federalist underpinnings of our national energy regulatory structure require a balancing of state and federal interests in the development of the power grid. State regulatory participation in cost allocation is essential to assuring that the most economic solutions for ratepayers are pursued, while costs for unnecessary and unbeneficial facilities are not assessed upon customers.

In addition, consistent with the Chamber’s support for regional flexibility with respect to any reforms to the Commission’s established regional transmission planning processes, the Chamber supports the NOPR’s proposal to provide flexibility to transmission providers in the process by which they seek cost allocation agreement among relevant state entities.²⁷ However, in apparent conflict with this call for flexibility, the NOPR proposes to limit state-negotiated cost allocation agreements to a timeline of 90 days.²⁸ Given the complexity of the analysis required and necessary calculation of a broad range of costs and benefits stemming from new regional transmission facilities, the Chamber believes that an unreasonably tight timeframe for obtaining state agreement on cost allocation may undermine the potential for agreement.

VII. The Right-Sizing of Transmission Replacements Makes Common Sense

The NOPR asserts that a more transparent and open process addressing the consideration of in-kind replacements of local transmission facilities might enhance long-term regional transmission plans and lead to the construction of more efficient and cost-effective transmission facilities.²⁹ Along these lines, the NOPR proposes to institute an iterative stakeholder process whereby local transmission planning assumptions and an assessment of reliability and other transmission needs feed into a “Solutions Meeting” where needs on the local transmission level are compared to and

²⁶ NOPR at P 302, fn. 509.

²⁷ NOPR at P 306.

²⁸ NOPR at P 323.

²⁹ NOPR at P 399.

potentially integrated into regional transmission plans.³⁰ While more would have to be established with respect to the specifics of such a process, the overall concept of “right-sizing” transmission in a manner that is both cost-effective and also potentially beneficial from an environmental impact/siting perspective appears worthy of further exploration. The combination of smaller, local projects into larger regional projects has the potential to provide more benefits per dollar of investment than the in-kind rebuild of existing facilities. Provided that this assumption is correct, right-sizing of transmission should benefit customers, reliability, and the integration of a changing generation mix. In addition, it makes sense that the federal right of first refusal otherwise applicable to a planned in-kind replacement would similarly attach to a right-sized regional transmission facility, thereby eliminating any incentive to otherwise withhold such in-kind replacements from the enhanced stakeholder planning process.³¹

VIII. The Transmission Monitor Concept Was Appropriately Discarded

One of the more concerning proposals presented within the ANOPR was the proposition as to whether the Commission should require that RTOs and ISOs, as well as the transmission planning regions outside of such markets, establish an independent entity to oversee the planning and cost allocation for transmission facilities within their respective regions.³² The ANOPR questioned whether such an entity should have the authority to review transmission planning and cost allocation decisions in advance of the commencement of facility construction. The ANOPR also inquired as to whether this new monitoring entity should have the ability to examine whether a different portfolio of facilities – aside from those presented to it through the applicable regional transmission planning process – could potentially lead to higher net benefits.³³

In its comments responsive to the ANOPR, the Chamber expressed its view that the imposition of a duplicative layer of “independence” into the area of transmission planning and cost allocation would be counterproductive. The Chamber noted that the whole point of RTO and ISO markets is to impose a level of independence over transmission service, but that the insertion of a secondary level of “independence” would be an inefficient and poor use of resources that would likely lead to the second-guessing of every decision resulting from the transmission planning process. As such, an independent transmission planning monitor would have adverse impacts on customer cost, the continuity of system reliability, and also result in increased litigation. Based on this reasoning, the Chamber commends the Commission for recognizing – through its omission from the NOPR – that an independent monitor would erect barriers

³⁰ NOPR at P 401.

³¹ NOPR at P 409.

³² ANOPR at P 163.

³³ ANOPR at PP 165-166.

to the Commission's goal of reforming and accelerating regional transmission expansion and cost allocation processes. The Chamber similarly requests here that such a proposal not reappear in any final rule issued in this proceeding.

IV. Conclusion

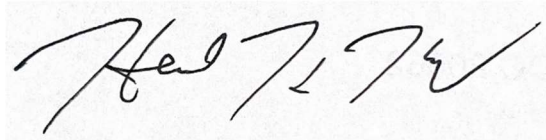
The Chamber again applauds the Commission for recognizing the importance of efficient and cost-effective transmission planning and cost allocation to facilitate the ongoing transition of the United States' electric grid to support a lower-carbon generation resource mix. As we noted in our ANOPR comments, current shortcomings in the efficiency and efficacy of the regional transmission planning and generator interconnection processes may be hampering this transition, but a complete rewrite of the transmission planning and generator interconnection processes that result from thousands of stakeholder hours over multiple decades would be counterproductive. Instead, as is largely evident from the limited scope of the NOPR, the Commission has correctly identified the specific improvements that it believes are needed and has targeted the reforms proposed within it on effectuating these discrete goals. Such a focused approach offers a much greater chance of implementing beneficial process enhancements without risking the numerous unintended consequences that could result from broadly comprehensive revisions to regional transmission planning processes.

The NOPR's support for a more holistic long-term regional transmission planning process is commendable, even though the extended timeframe to this process (20-years from project in-service date) may lean a bit too far into the future to support the reduced quantity and enhanced quality of the assumptions necessary to develop transmission planning scenarios that result in true "least-regrets" planning. In addition, while not fully evident within the NOPR, regional flexibility should underpin much of the reforms set forth therein due to the well-engrained differences across markets and planning regions throughout the country. Furthermore, the Chamber agrees that state regulator buy-in on cost allocation decisions is essential but cautions that an *ex ante* state agreement cost allocation process is unlikely to experience much use due to the unique circumstances, costs, and associated benefits – and the unique geographic scope – of any specific regional transmission expansion project. Discrete regional planning reforms, combined with enhanced coordination with state regulators and the continued potential for nationwide permit streamlining reforms may serve to accelerate the transmission buildout necessary to support an evolving generation resource mix. Throughout its analysis of NOPR comments and its development of an anticipated final rule, the Commission should keep its core obligations of just and reasonable rates and

bulk electric system reliability front and center. Other policy objectives must remain secondary to those core Commission responsibilities.

The Chamber appreciates the opportunity to comment on the NOPR. If you have any questions or need additional information regarding these comments, please contact me at (202) 463-5874 or hknakmuhs@uschamber.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath K. Knakmuhs", written in a cursive style.

Heath K. Knakmuhs
Vice President and Policy Counsel
Global Energy Institute
U.S. Chamber of Commerce