

December 7, 2023

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

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

It is widely recognized that significant new investment in transmission is needed to meet pressing changes such as an evolving generation resource mix, increasing electrification, and challenges to electric system reliability posed by extreme weather. We support the Commission's proposal for regional, long-term, scenario-based transmission planning and urge the Commission to issue, as soon as practicable, a final rule that will facilitate needed transmission investment. The Commission should ensure that the final rule is sufficiently robust to achieve the Commission's goal of ensuring just and reasonable rates and “remedy[ing] deficiencies in the Commission's existing regional transmission planning and cost allocation requirements.”

As the Commission recognizes, patterns of load, generation, and weather are changing, and the Commission’s policies must ensure that transmission planners account for these changes. Transmission plans should be structured to identify investments that maximize benefits to customers. State input can and should be incorporated, along with a means of resolving disagreements on cost sharing for transmission plans. The final rule should also require implementation of the proposed right of first refusal provisions to facilitate timely development of needed transmission infrastructure. These provisions are appropriately tied to collaborative and holistic planning outcomes that provide clear benefits to customers, such as jointly owned regional projects and portfolios and “right-sized” projects, and would benefit the goals enunciated by the Commission throughout this rulemaking process. Finally, advanced technologies should be considered and included where appropriate, and planning processes should preserve appropriate levels of transparency for impacted stakeholders.

A weakened rule – that is, any rule that does not include these features – risks falling short of facilitating the grid Americans need. A robust rule with these features will help grow the economy, keep people safe during extreme weather, and hold electricity bills down. As the Commission completes its vital work on these issues, we stand ready to work with you to help finalize a strong transmission planning rule.

Signed,

/s/ Shawn Schukar
Shawn Schukar
President
Ameren Transmission

/s/ Jason Walsh
Jason Walsh
Executive Director
Blue-Green Alliance

/s/ Matthew Ketschke

Matthew Ketschke
President
Consolidated Edison Company of New York,
Inc.

/s/ Caroline Choi

Caroline Choi
Senior Vice President, Corporate Affairs
Edison International

/s/ Colette D. Honorable

Colette D. Honorable
Executive Vice President, Public Policy and
Chief External Affairs Officer
Exelon Corporation

/s/ Steve Etcher

Steve Etcher
Business Development Consultant
Greater Warren County Economic
Development Council

/s/ Bob Dean

Bob Dean
Business Manager
International Brotherhood of Electric Workers
IBEW 1245

/s/ William Neisman

William Neisman
Chairman
IBEW Illinois State Conference

/s/ Kenneth W. Cooper

Kenneth W. Cooper
President
IBEW International

/s/ Michael Clemons

Michael Clemons
International Vice President
IBEW Sixth District

/s/ Krista Tanner

Krista Tanner
Senior Vice President and Chief Business
Officer
ITC Holdings Corp.

/s/ Sarah Rose

Sarah Rose
Vice President of Climate
National Audubon Society

/s/ Carla Peterman

Carla Peterman
Executive Vice President, Corporate Affairs
and Chief Sustainability Officer
Pacific Gas & Electric Co.

/s/ Alexander Herrgott

Alexander Herrgott
President
The Permitting Institute

/s/ Kim C. Hanemann

Kim C. Hanemann
President and COO
Public Service Electric and Gas Company

/s/ Phillip James

Phillip James
General Manager
WEG Transformers USA

/s/ Frank Prager

Senior Vice President for Strategy, Security
and External Affairs and Chief Sustainability
Officer
Xcel Energy