

October 12, 2021

**Re: Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection, Docket No. RM21-17-000**

**Joint Statement in Support of Large-Scale Transmission**

Dear Chairman Glick, Commissioner Danly, Commissioner Clements and Commissioner Christie:

The signatories to this letter represent utilities, NGOs, think tanks, labor, national trade associations, and environmental organizations. We believe the diversity of the signatories reflects the fast-growing and widespread recognition of the importance of large-scale transmission to ensure that the nation's transmission system is capable of supporting future needs and that the Commission must lead in facilitating its construction.

Transmission benefits electricity users in many ways. As the recent NERC/FERC preliminary reliability assessment of the February 2021 winter storm (along with numerous previous assessments of other events) has found, generation sources can be impacted by a variety of threats, and large-scale transmission can help to mitigate these threats by moving power from where it is available to where it is needed. The ability to move power across large areas has also been shown to be necessary for reliable integration of low-cost carbon-free power, which is what consumers, utilities and states are procuring to meet clean energy demand. For the same reason, transmission expansion is often necessary for states to achieve their resource goals. We commend FERC for establishing the Federal-State Joint Task Force on Transmission and for seeking to work collaboratively with states in its rulemaking process.

We believe transmission planning should proactively incorporate projected future generation and customer electricity demand. We believe there are many benefits of transmission that should be incorporated into planning and cost allocation policies. We will defer to others, including the various signatories to this letter, to respond to the Commission's various questions on these topics.

We applaud the Commission for its leadership in identifying this need and opening this inquiry and we encourage moving towards rules that improve the structures and regulations under the Commission's jurisdiction that enable large-scale regional and interregional transmission expansion to ensure that we have a resilient, clean, reliable, and affordable power system.

Thank you for the opportunity to comment.

Sincerely,

**American Council on Renewable Energy**

Gregory Wetstone, President & CEO

**American Clean Power Association**

Gabe Tabak, Counsel

**Americans for a Clean Energy Grid**

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**Advanced Power Alliance**

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**Solar Energy Industries Association**

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