



May 22, 2023

Re: Support for Electric Transmission Siting and Permitting Reform

Dear House and Senate Leadership:

As leading national organizations representing the renewable energy sector, we are writing to voice our support for meaningful transmission permitting and siting reforms. These reforms are essential to realization of the 21st century transmission grid America needs to bolster economic competitiveness, ensure grid reliability in the face of increasingly frequent severe weather, and achieve the clean energy transition necessary to address the climate crisis.

We urge Congress to enact bipartisan transmission permitting legislation that builds on the transformational clean energy policies in the IRA. Research shows that we will need to double the pace of historical transmission deployment in order to maximize the carbon emission reduction benefits of this historic legislation. Essential elements of such an effort are outlined below, which include reforms to the Federal Power Act and policies that modernize National Environmental Policy Act (NEPA) reviews while maintaining bedrock environmental protections.

With regard to the Federal Power Act, we recommend reforms that: 1) enhance the Federal Energy Regulatory Commission's (FERC) siting authority over critical interstate transmission lines, 2) codify fair cost allocation language that allows transmission developers to recoup the costs of interregional lines from those who actually benefit, and allow for related petitioning to FERC, 3) improve interregional planning processes to better reflect the multiple benefits of an interconnected grid, and 4) direct FERC to implement an interregional transfer capability requirement to ensure that adjacent transmission planning regions are able to transfer electricity during times of stress on the grid. A number of important bills are under development to address these challenges.

We also urge that Congress consider NEPA reforms that: 1) prioritize upfront and meaningful stakeholder consultation, particularly with underserved communities, 2) provide reasonable timelines for Environmental Impact Statements and Environmental Assessments, 3) mandate designation of a lead agency to be responsible for a single environmental document, 4) establish a reasonable statute of limitations for judicial review, and 5) provide sufficient resourcing for permitting agencies.

As permitting reform discussions occur in both the House and Senate, we encourage a bipartisan process through regular order. We urge that any negotiated framework addressing environmental reviews must also include requisite transmission siting and permitting reform. We oppose any effort to decouple these two important topics, including as part of debt ceiling negotiations.

We commend your efforts to build a decarbonized grid through a durable siting and permitting legislative package. As you set priorities for permitting reform, we look forward to working with you to ensure the bedrock of environmental law is secure while creating certainty for transmission development.

Sincerely,

American Council on Renewable Energy (ACORE)

Advanced Energy United (United)

Solar Energy Industries Association (SEIA)