



October 10, 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 Chairman Phillips and Commissioners Danly, Clements, and Christie,

As the CEOs of the National Urban League (NUL) and the American Council on Renewable Energy (ACORE), we are writing to express our appreciation for your commitment to an equitable energy transition and to a 21st-century grid that is reliable, affordable, and sustainable. As you noted in your concurrence on the proposed regional transmission planning and cost allocation rule, an expansion of the nation's grid is necessary to bring new clean energy resources online and to improve reliability in the face of increasing severe weather events and wildfires.

Earlier this year, we co-authored a special section in the NUL's annual [State of Black America](#) report entitled [Climate in Crisis](#), which highlighted that black, brown, and underserved communities suffer the most when our electrical grid is unable to grapple with the increasingly frequent severe weather associated with our changing climate. When we consider the unprecedented heat of this past summer - which included, for example, 26 days of temperatures exceeding 110 degrees in Phoenix and 45 consecutive days of temperatures over 100 degrees in Austin - it is clear that such disadvantaged communities could be at grave risk should there be a grid failure. Our [Climate in Crises](#) report discusses how these communities also bear a disproportionate share of pollution exposure from higher-emitting generation resources, suffer more from extreme weather events, and often have a greater energy cost burden.

Recognizing the critical role of transmission planning in enhancing reliability, ensuring that costs paid by consumers are "just and reasonable," and enabling our grid to better withstand the climate challenge, we respectfully urge the Commission to expedite the completion of a strong final rule on Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection (Docket No. RM21-17-000).

We were pleased to see that in your response to Senate Majority Leader Schumer's July 20, 2023 letter, you note your "strong agreement" with the "importance of issuing final rules that promote the development of much-needed electric transmission." We want to go on record encouraging expeditious completion of a strong final rule and expressing our agreement with the key touchstones listed in Senator Schumer's letter. These include: (1) a prescribed set of benefits, including those that accrue during times of system stress; (2) a mechanism to determine a cost allocation method when the states are unable to agree; (3) the use of long-term scenarios that include a high penetration of renewable resources; and (4) the incorporation of non-wires technologies and reconductoring of existing lines.

Thank you again for your attention to these important issues. Please do not hesitate to reach out if we can provide additional information or otherwise be helpful.

Sincerely,

A handwritten signature in blue ink that reads "Marc Morial".

Marc Morial
President and CEO
National Urban League

A handwritten signature in black ink that reads "Gregory S. Wetstone".

Gregory Wetstone
President and CEO
American Council on Renewable Energy