



December 13, 2023

The Honorable Willie L. Phillips, Chair
The Honorable Allison Clements, Commissioner
The Honorable Mark C. Christie, Commissioner
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

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

Dear Chair Phillips and Commissioners Clements and Christie,

The American Council on Renewable Energy (ACORE), representing major financial institutions, developers, manufacturers, and corporate renewable energy buyers, urges you to act at this critical time to improve regional transmission planning and cost allocation in a manner that is widely supported by investors, policymakers, and consumers. ACORE is specifically asking you to strengthen and finalize the Commission's pending rule as soon as practicable.

At the Commission's 2023 Annual Reliability Technical Conference, multiple panelists emphasized the important role that long-term proactive transmission planning plays in ensuring reliability.¹ As Chair Phillips noted in his concurrence on the proposed regional transmission planning and cost allocation rule, an expansion of the nation's grid is necessary to reliably and affordably accommodate new generation and improve reliability in the face of increasing severe weather events and wildfires.² A strong final rule is also essential for ensuring future transmission costs are just and reasonable.

A strong final rule should at a minimum include: (1) a prescribed set of benefits that include the full value of transmission, including during extreme weather and other causes 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 plan for the energy mix and demand of the future, including scenarios for a high energy demand and penetration of renewable resources; and (4) the incorporation of grid-enhancing technologies (GETs), high performance conductors and other technologies that increase transmission capacity over existing assets and rights of way.

¹ See written comments of Pam Sporborg, Portland General Electric Company; Robert Bradish, American Electric Power Service Corporation; Ric O'Connell, GridLab; and Joseph Goffman, U.S. Environmental Protection Agency, *2023 Annual Reliability Technical Conference*, Docket AD23-9-000 (Nov. 9, 2023).

² Commissioner Phillips Concurrence at P 3, 87 Fed. Reg. 26610 (May 4, 2022).

Issuance of a final transmission planning rule without the above provisions would be a significant lost opportunity to achieve the full range of transmission's economic and reliability benefits.

ACORE and its members stand ready to support the Commission in its issuance of a strong final rule on regional transmission planning and cost allocation.

Sincerely,

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