

**TO:** U.S. Department of Energy (DOE), Grid Deployment Office

**FROM:** American Council on Renewable Energy (ACORE)

**RE:** Guidance on Implementing Section 216(a) of the Federal Power Act to Designate National Interest Electric Transmission Corridors (NIETCs): Phase 1 Information Submission

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In response to the above referenced Guidance, the American Council on Renewable Energy (ACORE) is submitting this statement of support for the recommendations made by the Public Interest Organizations (PIOs) for DOE to designate as a NIETC the geographic areas encompassing the four proposed interlinks connecting ISO New England Inc. (ISO-NE), New York Independent System Operator (NYISO), PJM Interconnection LLC (PJM), and the Carolinas as identified by DOE and the Bureau of Ocean Energy Management (BOEM) in the September 2023 Interim Action Plan for Offshore Wind Transmission Development in the U.S. Atlantic Region (Action Plan).<sup>1</sup>

ACORE greatly appreciates and supports DOE’s preliminary finding that “NIETC designation may be particularly valuable in geographic areas where the need for increased interregional transfer capacity has been identified.”<sup>2</sup>

As one of the sponsors of The Brattle Group report on *The Benefit and Urgency of Planned Offshore Transmission*,<sup>3</sup> ACORE recognizes the important need for coordinated transmission planning for the offshore wind resources identified in the Action Plan. As demonstrated in the PIO’s submission, such transmission meets many of the criteria for a NIETC designation and is essential for obtaining the full benefits of the growing offshore wind industry. Such a designation is in line with DOE’s encouragement of “multi-driver, multi-value transmission planning” and its approach to “NIETC designation with the aim of maximizing value across the range of transmission needs that may be addressed through transmission development within a potential NIETC.”<sup>4</sup>

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<sup>1</sup> U.S. Dept. of Energy and Bureau of Ocean Energy Management, An Action Plan for Offshore Wind Transmission Development in the U.S. Atlantic Region (Interim Draft Published Sept. 2023), [https://www.energy.gov/sites/default/files/2023-10/Atlantic-Offshore-Wind-Transmission-Plan-Report\\_October-2023.pdf](https://www.energy.gov/sites/default/files/2023-10/Atlantic-Offshore-Wind-Transmission-Plan-Report_October-2023.pdf)

<sup>2</sup> Guidance at 6.

<sup>3</sup> Available at: <https://acore.org/resources/the-benefit-and-urgency-of-planned-offshore-transmission-reducing-the-costs-of-and-barriers-to-achieving-u-s-clean-energy-goals/>

<sup>4</sup> Guidance at 24.

We recognize that this ACORE statement is being submitted past the February 2 deadline stipulated in the Guidance, but given the brevity of these comments, respectfully request that DOE accept this late submission.

Respectfully submitted,

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