ACORE Response to the U.S. Department of Transportation Request for Information on America's Great Corridors of Commerce

Docket No. DOT-OST- 2026-3269

October 2, 2026

I. Introduction

ACORE is a 501(c)(3) national nonprofit organization that unites finance, policy and technology to accelerate the transition to a clean energy economy.[1] Our members are collectively responsible for 90 percent of the utility-scale clean energy capacity growth in the United States. Ensuring that there is sufficient transmission to deliver the power from this capacity to customers is central to ACORE's mission. ACORE also houses the Macro Grid Initiative, an educational program focused on bolstering the nation's transmission capacity by building new high-voltage regional and interregional power lines, deploying advanced transmission technologies, and developing an offshore grid.[2]

ACORE commends the Department of Transportation (DOT) for initiating the America's Great Corridors of Commerce (AGCC) program through the issuance of this Request for Information (RFI). We agree with Transportation Secretary Duffy's emphasis on the need for new transmission in his statement that "[w]hile new power plants are coming online in America, transporting affordable energy to growing communities and manufacturing hubs is constrained by the nation's severe lack of transmission grid capacity."[3] Utilizing existing transportation rights of way (ROW) for the construction of transmission lines, especially long range high voltage lines, is one of many important strategies for this necessary expansion of the grid. It is worth noting that the optimal route for a transmission line may not always align with existing highway and rail ROWs, and this initiative does not negate the need for ongoing improvements to the planning, financing and permitting of needed transmission lines.

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[1] See https://acore.org/about/.

[2] See https://acore.org/initiatives/macro-grid-initiative/.

[3] *Trump's Transportation Secretary Sean P. Duffy Unveils 'America's Great Corridors of Commerce' to Transform Highways & Railroads into Multi-Use Arteries to Power Economy of the Future* (Aug. 26, 2026), https://www.transportation.gov/briefing-room/trumps-transportation-secretary-sean-p-duffy-unveils-americas-great-corridors.

In this response, ACORE supports the overall approach to the AGCC while recommending clarifications and additional steps to be taken by the DOT prior to issuance of the Request for Expressions of Interest (RFEI). ACORE also urges the DOT to closely collaborate and communicate with state Departments of Transportation to ensure that the AGCC meets their needs and maximizes state participation.

II. Technology Neutrality

To optimize the value of the AGCCs, ACORE recommends that the DOT consider the full range of beneficial infrastructure that can be collocated on these ROWs in the upcoming RFEI. Specifically, DOT should clarify that the evaluation of the RFEI applications will be neutral and not prioritize transmission based on the likely generation source that it is delivering. Transmission does not differentiate among electrons, and the selection of projects should be based on the reliability and cost reduction benefits obtained by transmission that can access multiple generation resources.

Further, ACORE recommends the RFEI not be restricted to linear infrastructure (electrical transmission lines, water pipelines along highways, pipelines along railways, fiber optic, and rural broadband) or only to underground facilities. While transmission is a priority, opportunities also exist for incorporating storage or generation facilities into the project to obtain additional benefits.

Generation and storage opportunities should include energy technologies that can be incorporated directly into transportation infrastructure, such as solar-integrated noise barriers, sound walls, and other dual-purpose infrastructure. Such projects can simultaneously provide transportation-related functions while generating electricity or providing energy storage without requiring additional developable land. They can also create additional value for transportation agencies and corridor owners through energy production, potential lease or revenue-sharing arrangements, and reduced lifecycle infrastructure costs.

As described in the RFI, one of the AGCC's goals is to "incentivize data centers, manufacturing facilities, and distribution hubs to locate close to AGCC corridors to leverage a 'plug and play' model." Under that scenario, these large energy consumers would benefit from access to both transmission and proximate generation and storage resources.

III. Permitting Improvements

A key challenge to developing needed transmission is the state and federal permitting processes, especially where different state entities issue permits for a single transmission project. The primary tool to address a situation where states deny, delay or do not act on permits for a transmission line found to be in the national interest is the use of Federal Energy Regulatory Commission (FERC) backstop siting authority.[4] However, that authority requires that the Department of Energy (DOE) first establish National Interest Electric Transmission Corridors, which currently do not exist.[5] Therefore, an important role for the to-be-formed federal task force will be to coordinate closely with state permitting agencies to seek agreements and explore opportunities for revenue-sharing mechanisms to facilitate joint state permitting of the lines.

At the federal level, an important option to improve the permitting of transmission is the use of Categorical Exclusions from the National Environmental Policy Act (NEPA), as discussed in the RFI. For transmission lines, DOE provides the following categorical exclusions:[6]

> **B4.12 Construction of powerlines**. Construction of electric powerlines approximately 10 miles in length or less, or approximately 20 miles in length or less within previously disturbed or developed powerline or pipeline rights-of-way.
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> **B4.13 Upgrading and rebuilding existing powerlines**. Upgrading or rebuilding existing electric powerlines, which may involve relocations of small segments of the powerlines within an existing powerline right-of-way or within otherwise previously disturbed or developed lands (as discussed at section 5.4(b)(1)). Upgrading or rebuilding existing electric powerlines also may involve widening an existing powerline right-of-way to meet current electrical standards if the widening remains within previously disturbed or developed lands and only extends into a small area beyond such lands as needed to comply with applicable electrical standards. Covered actions would be in accordance with applicable requirements, including the integral elements listed at the start of this appendix; and would incorporate appropriate design and construction standards, control technologies, and best management practices. This categorical exclusion does not apply

[4] See U.S. Federal Energy Regulatory Commission, *Electric Transmission Siting*, https://ferc.gov/electric-transmission-siting.

[5] U.S. Department of Energy, *Energy Secretary Announces Cancellation of Three Proposed National Interest Electric Transmission Corridors* (Aug. 12, 2026), https://www.energy.gov/articles/energy-secretary-announces-cancellation-three-proposed-national-interest-electric.

[6] U.S. Department of Energy, *National Environmental Policy Act (NEPA) Implementing Procedures*, July 13, 2026, https://www.energy.gov/sites/default/files/2026-07/DOE%20NEPA%20Implementing%20Procedures%2020260713.pdf.

to underwater powerlines. As used in this categorical exclusion, "small" has the meaning discussed at section 5.4(b)(2)).

B4.12 is the Categorical Exclusion that would be used for new transmission lines constructed within an ROW, but there are several limitations to its use: it is subject to a restriction of 20 miles for previously disturbed areas, the rights-of way only refer to powerlines or pipelines – not transportation, and while the Department of Interior (DOI) has adopted B4.13, it has not adopted B4.12.[7]

To reduce uncertainty in the RFEI, the DOT should clarify that it will work with the DOE and DOI to update their NEPA implementing procedures to ensure that this Categorical Exclusion can be used for the AGCC lines without a mileage limitation.

To the extent that Categorical Exclusions are not applicable, the DOT should explain how the permitting process for the AGCC projects can utilize existing programs to streamline permitting, especially the DOE's Coordinated Interagency Transmission Authorizations and Permitting (CITAP) program for transmission lines where DOE acts as the lead agency.[8] If CITAP itself is not applicable, then the key elements of CITAP should be applied, especially a streamlined schedule of permitting milestones, community engagement, and a single accountable federal lead agency. The DOT should use programmatic or corridor-wide reviews for these projects to avoid multiple duplicative studies and include these projects in the Permitting Council's Dashboard to provide greater transparency.[9]

IV. Participation of Independent Transmission, Storage and Generation Developers

The RFI makes multiple references to "utility infrastructure" but does not provide a definition of a utility. It is important that independent transmission developers that do not fall under the ownership of a utility are given the full and equal opportunity to participate in the

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[7] U.S. Department of Interior, *Notice of Adoption of Categorical Exclusions under Section 109 of the National Environmental Policy Act*, 90 FR 4774 (Jan. 16, 2025), https://www.federalregister.gov/documents/2025/01/16/2025-01057/notice-of-adoption-of-categorical-exclusions-under-section-109-of-the-national-environmental-policy; *DOI Handbook of NEPA Procedures* (Feb. 2026), https://www.doi.gov/media/document/doi-handbook-nepa-procedures

[8] See https://www.energy.gov/oe/coordinated-interagency-transmission-authorizations-and-permits-program.

[9] See https://www.permits.performance.gov/.

AGCC program on the same level as utilities. A September 1, 2026 Federal Highway Administration memorandum addresses this issue, as follows:[10]

- As a separate path from accommodation as "utilities," FHWA may approve alternative uses of the highway ROW if it is determined that such occupancy, use, or reservation is in the public interest and will not impair the highway or interfere with the free and safe flow of traffic thereon (23 CFR 1.23(c)).
- This memorandum establishes that electrical transmission, water transmission, and broadband projects are acceptable alternative uses of the Interstate or non-Interstate highway ROW and are in the public interest if they comply with 23 U.S.C. 111 and Federal property management regulations at 23 CFR 1.23, 23 CFR part 710.

This same clarification should be given to transmission projects within rail transportation ROW under the AGCC. Moreover, to the extent that AGCCs also include storage and generation facilities, as ACORE recommends independent power producers should also be able to participate on an equal basis to utilities.

V. Financing Availability

DOT is not proposing any new financing for the AGCC projects and instead states that "underground utility tunnels or conduits may be eligible for financing by the Build America Bureau's TIFIA or RRIF loans or Department of Energy (DOE)'s Energy Dominance Financing (EDF)."

It is not clear however whether these financing programs are tailored to the unique aspects of the transmission lines developed under the AGCC program. For example, the DOE EDF Title 1706 program applies to projects that: "retool, repower, repurpose, or replace Energy Infrastructure that has ceased operations; enable operating Energy Infrastructure to increase capacity or output; or support or enable the provision of known or forecastable electric supply at time intervals necessary to maintain or enhance grid reliability or other system adequacy needs."[11] Such language may unnecessarily restrict the applicability of EDF for new

[10] U.S. Federal Highway Administration, *America's Great Corridors of Commerce Guidance on the Use of Highway Right-of-Way* (Sep. 1, 2026), https://www.fhwa.dot.gov/real_estate/right-of-way/corridor_management/guidance-use-highway-right-of-way.pdf

[11] U.S Department of Energy, *Program Guidance for the Title 17 Energy Financing Program: Including the Energy Dominance Financing Program* (May 2026), https://www.energy.gov/documents/doe-edf-title-17-energy-financing-program-guidance-2026-05-13

transmission lines developed under the AGCC. Additional guidance should therefore be issued for these financing programs that clarifies their availability for the AGCC program. Moreover, there is no basis for limiting the use of such financing only for underground lines, which may exclude beneficial infrastructure that cannot be placed underground.

VI. Flexibility in the P3 Arrangements

DOT explains in the RFI that:

> Under the AGCC P3 model, the ROW owner may negotiate a contractual agreement with a private entity to serve as a Corridor Manager. The Corridor Manager may act as the central project leader and take on responsibilities such as business development, design, construction, finance, and long-term operation and maintenance.

While this framework is reasonable and can be beneficial for some projects, it can create inefficiencies for infrastructure developers who are experienced and skilled at identifying and obtaining available ROWs, financing, and engineering, procurement and construction (EPC) contractors. The requirement for a Corridor Manager could add cost, delay, and an additional revenue-sharing layer that could hinder rather than catalyze the development of the project, and as a result, reduce the cost savings benefit. The P3 model and template should therefore be flexible and voluntary and specifically allow an experienced transmission developer to serve as its own Corridor Manager or contract directly with the ROW owner.

VII. Clarification of Alignment with State Permitting

DOT states in the RFI that it "may favor applications for AGCC designation in states and regions that have state-level environmental policies, utility accommodation policies and permitting policies that are in sync with the environmental and permitting streamlining at the federal level." Given that the DOT is not an environmental agency nor is the AGCC an environmental program, this provision requires more explanation in the RFEI. ACORE urges the DOT to be fully transparent in the evaluation process to select the AGCCs, including how and which state policies are considered.

VIII. Ongoing Coordination is Essential

The siting of high-voltage transmission within active highway and rail ROWs raises considerations that call for early collaboration between the DOT and developers, including

electrical clearances, induction and interference with rail signaling and adjacent pipelines, maintenance and outage access, structure siting within constrained corridors, and future transportation expansion needs, including terms that could require a developer to relocate structures if the ROW owner later widens the roadway. It would be beneficial for the DOT to establish the parameters for such collaboration in the RFEI.

IX. Conclusion

ACORE appreciates the opportunity to respond to this RFI and urges DOT to provide additional clarification, along with important steps to improve the permitting and financing of these projects. ACORE stands ready to work with the DOT on the implementation of the AGCC initiative.

Respectfully submitted,

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October 2, 2026