



WIRES

Voice of the Electric Transmission Industry



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**For further information, contact: Brent Gilroy
301-466-9197 / brent@wiresgroup.com**

WIRES Says EPA Power Plant Regulations Must Be Redrawn To Account for Transmission If Clean Air Initiative Is To Succeed

WASHINGTON, DC – In its [December 1 comments](#) on the **Environmental Protection Agency's** proposed **Clean Power Plan** to curb CO2 emissions from electric generating units, **WIRES** argued that the EPA failed to consider the implications – positive and negative – of electric transmission infrastructure for the success of the CPP.

WIRES said the proposed regulation “has effectively ruled out transmission as a direct means of compliance with the rule or a key support for a more diverse base of electric generation resources and for the reliability and efficiency of the electric system. Noting that the “Building Blocks” that the EPA urges states to use to achieve lower emissions over the next 15 years involve deployment of new renewable energy and natural gas generation, **WIRES** stressed that delivery of new generation – often from remote locations – depends on adequate transmission, which is in need of modernization and expansion in many parts of the country.

WIRES said the CPP will depend heavily on “a greater appreciation of the likely impacts that the **Clean Power Plan** will have on the high-voltage transmission system and, conversely, the risks and costs of ignoring the role of the high-voltage grid in bridging the gap between diverse, high quality renewable resources and the bulk of electricity consumers, relieving chronic and costly congestion of the power system, and shifting the dispatch of natural gas-fired electric generation resources.”

“I fear that our comments will be swamped by the 2 million other interests that have weighed in before the EPA. Disregarding critical energy delivery infrastructure would be a big problem for EPA, not just the industry,” said **Jim Hoecker, WIRES Counsel and former Chairman of the Federal Energy Regulatory Commission**. “If the EPA is going to launch some very fundamental changes to the electric system without asking states to consider the strategic value of transmission in their plans, the process starts to look flawed and downright impractical. Any transition to the new fuel mix that the CPP promotes in the interest of lowering the industry’s carbon output has to be based on an understanding of the time and resources needed to bring on new transmission to ensure the objectives of these Building Blocks are real,” Hoecker said.

“Foremost, **WIRES** believes reliability cannot be sacrificed as the EPA raises the environmental bar for this critical industry. Also, the time it takes to plan, permit and construct transmission that

will be needed as a result of the rule should not be underestimated,” said **Bob McKee**, **WIRES’ Vice President** and Manager of Regulatory Relations and Policy at American Transmission Co. “Transmission can be a critical element to EPA achieving its objectives and should not be overlooked.”

WIRES asked the EPA to ensure that state implementation plans include high-voltage transmission development and that the best industry expertise is brought into implementation processes. It also pointed to the important role that FERC and its Order No. 1000 planning regime can play in facilitating state and regional CPP implementation. **WIRES** reiterated its willingness help the EPA as it works through the complex issues raised by the CPP proposal.

WIRES is an international non-profit trade association of investor-, publicly-, and cooperatively owned transmission providers, transmission customers, regional grid managers, and equipment and service companies. WIRES promotes investment in electric transmission and progressive state and federal policies that advance energy markets, economic efficiency, and consumer and environmental benefits through development of electric power infrastructure. For more information, visit www.wiresgroup.com or contact Jim Hoecker at 202-378-2316.