

On June 17, 2021, FERC issued an order pursuant to section 209(b) of the Federal Power Act establishing a Joint Federal-State Task Force on Electric Transmission (“Task Force”) soliciting nominations for state commission representatives on the Task Force, setting forth preliminary details of the Task Force, and identifying topics for the Task Force to consider.⁴ Subsequently, the Commission issued the August 30 Order listing the members of the Task Force and their roles, scheduling the first public meeting of the Task Force for November 10, 2021 in Louisville, Kentucky, and inviting all interested persons to submit comments on agenda topics for the Task Force meeting within the broad topic area of identifying barriers that inhibit planning and development of more efficient and effective transmission necessary to achieve federal and state policy goals, both within FERC rules and regulations regarding planning and cost allocation of transmission projects and at the state level, as well as potential solutions to those barriers. WIRES submits the following brief comments in response to the August 30 Order.

II. COMMENTS

The demands on the nation’s transmission system are extensive, and the need for greater investment in transmission is growing. Investment in transmission will facilitate several critical and timely needs including the following: meeting ambitious clean energy mandates and goals established by the states; supporting overall system reliability and resilience, particularly in response to increasing

⁴ *Joint Fed.-State Task Force on Elec. Transmission*, 175 FERC ¶ 61,224 at P 1 (2021).

extreme weather events such as Hurricane Ida, the Texas cold-weather outages, and the wildfires in California and the Pacific Northwest; rising electrification demand driven by increasing electrification in the transportation, building, and industrial and agricultural sectors; and finally, but importantly, providing an economic jumpstart through the sales and resales of goods and services and supporting a high number of fulltime jobs, both of which are badly needed during the ongoing economic recovery from the COVID-19 pandemic.

In the context of considering barriers that inhibit the planning and development of transmission to meet these pressing needs, topics the Task Force should consider include:

- Extreme weather events such as Hurricane Ida highlight in dramatic fashion the importance of local reliability planning and development as a critical complimentary component to regional reliability planning and development. It will be essential to ensure that any rules and regulations regarding planning and cost allocation of transmission projects do not inadvertently inhibit the processes that currently exist that lead to proper reliability planning, asset modernization, storm hardening, customer service, and development and allow individual states to explore their public policy goals and objectives.
- Collaboration among transmission owners and transmission developers should be encouraged, and the task force should consider how policies promoting greater collaboration between existing asset owners, developers, states, RTOs, and other stakeholders might minimize impediments to transmission development.
- The extent to which a proactive regional planning approach could bring broad benefits and lower costs to customers, and the extent to

which regional state cooperation can facilitate such processes and reduce the potential for impasse or protracted litigation.

- The extent to which transparency requirements, while well-intentioned, can impede transmission planning to the extent disclosure of information undermines security.
- Whether and to what extent Order 1000 hinders transmission planning and interconnection development progress through potentially time-consuming and contentious stakeholder processes and the increased potential for protracted litigation.
- The extent to which current interconnection queue processes encourage speculative projects that clog the queue and result in projects frequently dropping out of the queue, necessitating additional studies and resulting in further delay.

WIRES appreciates the invitation and opportunity to comment on the topics for the Task Force's November 10 opening meeting and respectfully requests the Task Force consider the items listed above for its agenda.

Respectfully submitted,

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