

ONE HUNDRED FIFTEENTH CONGRESS  
**Congress of the United States**  
**House of Representatives**  
COMMITTEE ON ENERGY AND COMMERCE  
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June 5, 2018

Mr. Rob Gramlich  
Founder and President  
Grid Strategies LLC  
9207 Kirkdale Road  
Bethesda, MD 20817

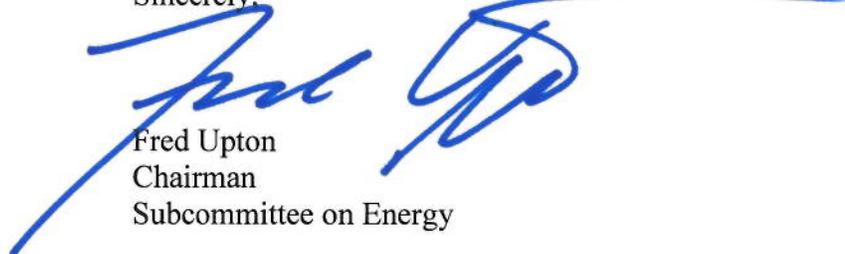
Dear Mr. Gramlich:

Thank you for appearing before the Subcommittee on Energy on Thursday, May 10, 2018, to testify at the hearing entitled "Examining the State of Electric Transmission Infrastructure: Investment, Planning, Construction, and Alternatives."

Pursuant to the Rules of the Committee on Energy and Commerce, the hearing record remains open for ten business days to permit Members to submit additional questions for the record, which are attached. To facilitate the printing of the hearing record, please respond to these questions with a transmittal letter by the close of business on Tuesday, June 19, 2018. Your responses should be mailed to Kelly Collins, Legislative Clerk, Committee on Energy and Commerce, 2125 Rayburn House Office Building, Washington, DC 20515 and e-mailed in Word format to [Kelly.Collins@mail.house.gov](mailto:Kelly.Collins@mail.house.gov).

Thank you again for your time and effort preparing and delivering testimony before the Subcommittee.

Sincerely,



Fred Upton  
Chairman  
Subcommittee on Energy

cc: The Honorable Bobby L. Rush, Ranking Member, Subcommittee on Energy

Attachment

## Attachment—Additional Questions for the Record

### The Honorable Fred Upton

1. Are Non-Transmission Alternatives such as energy storage, DER, and smart technologies receiving adequate consideration from transmission-owning utilities? Do incentives exist that would otherwise discourage utilities from adopting cheaper alternatives that would reduce costs for customers?
2. There's been some concern that utilities have an incentive to undertake large-scale transmission projects that aren't necessary for reliability, or to forgo lower cost alternatives that would avoid building new lines. What changes could be made to reduce this incentive so we can avoid making large investments in transmission when cheaper alternatives are available?

### The Honorable Richard Hudson

On April 19, FERC issued a new rule (Order No. 845) concerning revisions to the interconnection process for large generators which are over 20 MWs. The intent of this rule is to reduce the backlog of interconnection queue requests, however, these new regulations put the onus on the transmission provider to develop new procedures to accommodate additional flexibility for interconnecting generators. The interconnection process is already quite complicated with several studies often required to determine the impact of the new generation on the transmission grid with various deadlines for each specific step in the process. This was manageable when there were only a handful of interconnection requests in a year. However, these queues have grown more recently due to the significant increase in the number of smaller-sized interconnection requests for wind and solar generation. Developers typically put in several requests at one time, knowing that many of them will not get built. In some cases, there is more proposed generation in the queue than the total customer load in a particular area.

1. Do you believe that this new interconnection rule will alleviate these backlogs?
2. How would modifications made by interconnection customers affect the interconnection studies of later-queued requests?