

**TESTIMONY OF ROB GRAMLICH  
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**US HOUSE OF REPRESENTATIVES  
ENERGY AND COMMERCE COMMITTEE, ENERGY SUBCOMMITTEE**

**Hearing: “Wires, Rates, and States: Permitting Transmission for Reliable and Affordable Power”**

**May 13, 2026**

**I. Introduction and Summary**

Chairman Latta, Ranking Member Castor, Chairman Guthrie, Ranking Member Pallone, and distinguished Members of the Subcommittee, thank you for the opportunity to testify before you. My name is Rob Gramlich and I am Founder and President of Grid Strategies, a consulting firm providing research on the US transmission grid and power markets.<sup>1</sup>

Transmission capacity expansion was important when I testified at the invitation of Chairman Upton here in 2018<sup>2</sup> and Chairman Rush in 2021<sup>3</sup>, but now is much more so with significantly higher power demand forecasts.<sup>4</sup>

The main points I would like to share and demonstrate today are:

- Transmission is one way to hold consumer’ rates down.
- High and rising congestion on the grid is preventing access to whichever generating source might be the least cost at any given time.

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<sup>1</sup> Gramlich, House E&C Testimony 2018: <https://democrats-energycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/documents/Testimony-Gramlich-EP-Hrg-on-Examining-the-State-of-Electric-Transmission-Infrastructure-201.pdf>.

<sup>2</sup> Clients include large and small energy and transmission developers, large and small utilities and utility associations, state consumer advocate offices, state utility commissions and energy offices, technology companies, clean energy associations, and environmental NGOs. I served as Economic Advisor to Chairman Pat Wood III of the Federal Energy Regulatory Commission (FERC) during the George W. Bush Presidency, SVP and Interim CEO of a renewable energy trade association, and Senior Economist and independent market monitor for the PJM Interconnection.

<sup>3</sup> Gramlich, House E&C Testimony 2021: [https://democrats-energycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/documents/Witness%20Testimony\\_Gramlich\\_ENG\\_2021.06.29.pdf](https://democrats-energycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/documents/Witness%20Testimony_Gramlich_ENG_2021.06.29.pdf).

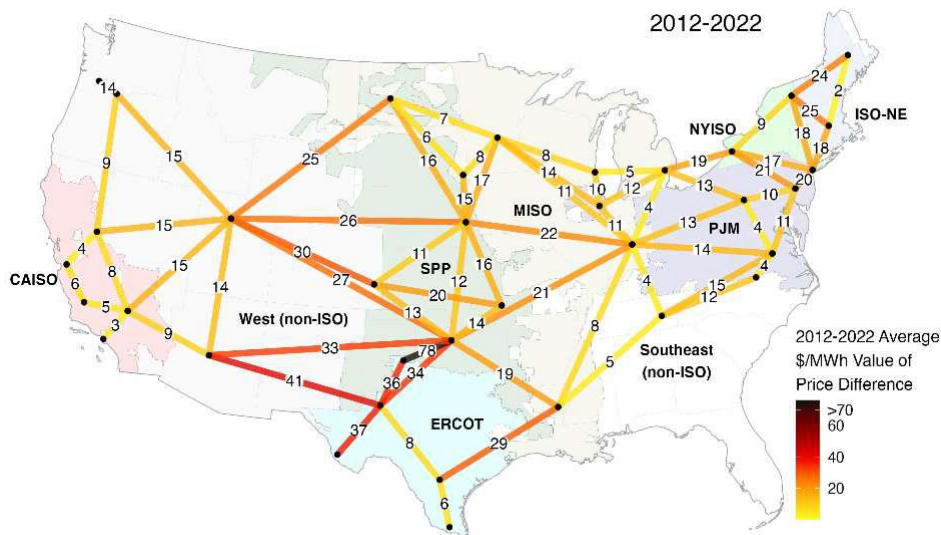
<sup>4</sup> Grid Strategies’ aggregation of utility forecasts shows the nation needs 30% more capacity or 166 GW by the end of the decade: <https://gridstrategiesllc.com/wp-content/uploads/National-Load-Growth-Report-2024-April-Update-Presentation.pdf>.

- Utility incentives are generally not aligned with expanding transmission capacity that brings high net benefits to consumers.
- Public policy is needed to make sure the types of transmission lines, technologies, and configuration with high net benefits are pursued.
- There are, and should remain, important roles for both state and federal governments in regulating electric power.
- As the need for wider regional grid operation and planning grows, Congress can act to address the national interest and better serve our modern economy’s needs.

## II. Transmission reduces electricity bills

The principle is simple—each utility area’s peak demand occurs at a different time, so instead of always building enough local generation to serve that load, interconnection between systems can achieve reliability at lower cost by sending power to the area that needs it. Early interconnections between utilities beginning in the late 1800s were installed for this reason. At times of rapid demand growth, interties like the Pacific DC Intertie were built to allow “large blocks of power [to] be shifted up and down the Pacific Coast” in accordance with seasonal demand.<sup>5</sup> Yet we still have vast untapped opportunities as reflected in the values that it would provide:

### Value of interregional capacity<sup>6</sup>



Large-scale transmission capacity would likely contribute more to power system affordability, reliability, and sustainability than any other single initiative. Of course, neither transmission nor

<sup>5</sup> US Department of the Interior Special Task Force, *Pacific Northwest-Pacific Southwest Extra-High Voltage Common Carrier Interconnection* (U.S. Government Printing Office, 1961), 19.

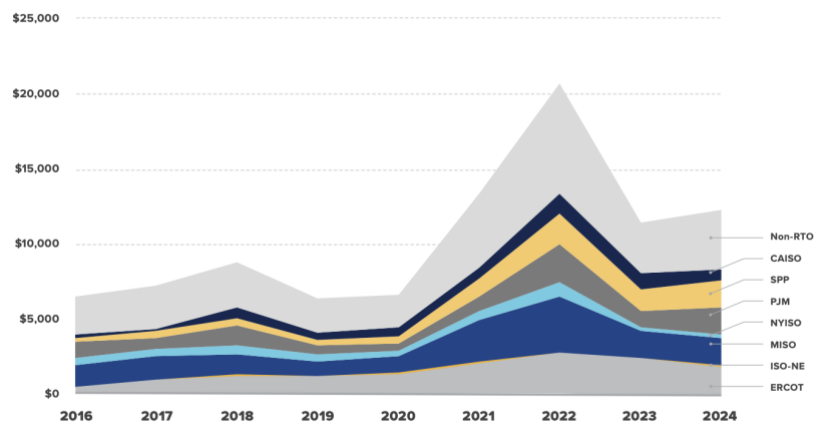
<sup>6</sup>Berkeley Lab, page 5: <https://www.researchsquare.com/article/rs-3957695/v1> .

any other single solution solves all of the industry’s current challenges; transmission must work together with a diverse generation portfolio and various investments and initiatives at the distribution level.

Electricity rates are high and rising for a few reasons, primarily: very old grid assets are due for replacement, old grid assets need to be both upgraded to withstand today’s more severe weather and replaced after damage, liability costs are rising for weather and wildfire related risks, power prices rose in regions where generation demand exceeds supply and states did not hedge (including most of PJM), natural gas prices rose which affects power prices, and electrical equipment is scarce and expensive.<sup>7</sup>

Benefit-cost ratios for new transmission are typically very positive due to the current capacity constraints. Investment in well-planned, high-capacity transmission could save residential consumers \$6.3- 10.4 billion per year across the United States after accounting for the cost of the transmission.<sup>8</sup> These numbers expand as the grid becomes more congested. Rising congestion costs demonstrate how inadequate transmission capacity raises power prices for ratepayers, driven fundamentally by limited transmission capacity. Prior to 2021, nationwide congestion costs were around \$6-\$8 billion per year, but since 2021 congestion has risen well above \$10 billion per year, with \$12 billion in congestion costs in 2024, and preliminary results showing even higher in 2025.<sup>9</sup>

Estimated total transmission congestion costs in 2024 across the contiguous United States are slightly higher than those in 2023.<sup>2</sup>



Source: Market monitor reports; see appendix

It is as if we have dozens of Straits of Hormuz around the power grid, where delivery constraints raise prices for consumers.

Transmission supports reliability and resilience more than any other option. Transmission lines typically have at least 99.85% availability across all voltage levels, far higher than any individual generation source.<sup>10</sup> Transmission networks are multi-directional, and once built they serve

<sup>7</sup> Berkeley Lab, <https://emp.lbl.gov/publications/factors-influencing-recent-trends> .

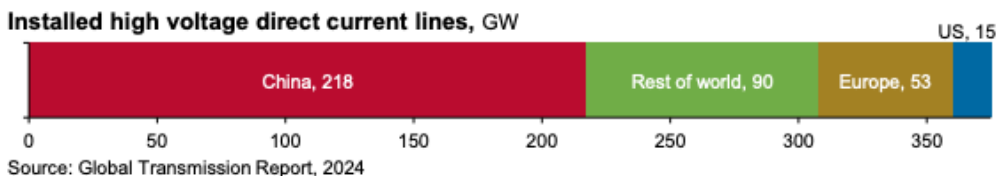
<sup>8</sup> [https://gridstrategiesllc.com/wp-content/uploads/GS\\_Transmission-Deployment-Saves-Consumers-Money\\_vf.pdf](https://gridstrategiesllc.com/wp-content/uploads/GS_Transmission-Deployment-Saves-Consumers-Money_vf.pdf)

<sup>9</sup> Grid Strategies, [https://gridstrategiesllc.com/wp-content/uploads/GS\\_Transmission-Congestion-for-2024.pdf](https://gridstrategiesllc.com/wp-content/uploads/GS_Transmission-Congestion-for-2024.pdf) .

<sup>10</sup> NERC Transmission Availability Data System. <https://www.nerc.com/pa/RAPA/tads/pages/default.aspx>

many needs that one could not have predicted ahead of time, moving power from where it exists to where it is needed, and it does so automatically and at the speed of light. With severe weather events in recent years, sometimes 10% of a region’s needs are met by large scale movements of power across major regions of the country. That is why interregional transmission is so important and was the focus of a Congressional requirement for the North American Electric Reliability Corporation (NERC) to study the need. NERC’s report<sup>11</sup> found a need for 35 GW of increased interregional transmission capacity, an increase of around 40% over current capacity.<sup>12</sup> Such investments would cost \$1.8 billion and return benefits of \$7.8 to \$10.6 billion, a benefit-cost ratio of 4.3 to 5.8.<sup>13</sup> Interregional capacity expansion by as little as 1 GW would have saved customers across 12 separate regions \$466 million over just five days during Winter Storm Elliott.<sup>14</sup>

Transmission supports US global economic competitiveness in an electronic era. China, Southeast Asia, and other leaders and competitors in technology recognize the importance of grid capacity. China built 80 times more high voltage transmission than the US in the second half of the 2010s, and that is continuing in the 2020s. In the 2020s,<sup>15</sup> China has completed more than 8200 miles of ultra-high voltage lines while the US has built only 375 miles. China is also planning 15 additional ultra-high-voltage DC lines by 2030, totaling roughly 10,000 miles and supporting its goal of increasing west-to-east transfer capacity from 340 GW in 2026 to 420 GW by 2030. European utilities are also rapidly increasing the minimum interregional transfer capacity between countries to move power back and forth to cover 15% of its installed generating capacity by 2030.<sup>16</sup> Europe has set a target for each country’s interregional transfer capacity to cover 15% of its installed generating capacity by 2030. Additionally, close to 150,000 miles of high-performance conductors, which can double the power capacity within existing corridors, have been installed in India, Europe, and China but the US has installed less than 10 percent of that.



<sup>11</sup> NERC Interregional Transmission Capacity Study, <https://www.nerc.com/initiatives/additional-initiatives/interregional-transfer-capability-study-itcs> .

<sup>12</sup> <https://www.nerc.com/pa/RAPA/Pages/ITCS.aspx>, Niskanen: we need 35 in addition to today’s 84 GW: <https://www.niskanencenter.org/how-congress-can-enable-a-more-resilient-grid/> [https://www.nerc.com/globalassets/initiatives/itcs/itcs\\_final\\_report.pdf](https://www.nerc.com/globalassets/initiatives/itcs/itcs_final_report.pdf)

<sup>13</sup> Goggin, Zimmerman, Ammann, [https://gridstrategiesllc.com/wp-content/uploads/GS\\_NRDC\\_NERCs-Recommended-Grid-Expansion-Report54.pdf](https://gridstrategiesllc.com/wp-content/uploads/GS_NRDC_NERCs-Recommended-Grid-Expansion-Report54.pdf) .

<sup>14</sup> Goggin, Michael., et al. The Value of Transmission During Winter Storm Elliott, Grid Strategies prepared for ACORE, February 2023.

<sup>15</sup> Graphic from Page 20 of Michael Cembalest’s [annual report](#) .

<sup>16</sup> European Commission, “Electricity interconnection targets,” available at [https://energy.ec.europa.eu/topics/infrastructure/electricity-interconnection-targets\\_en](https://energy.ec.europa.eu/topics/infrastructure/electricity-interconnection-targets_en)

Larger lines deliver more, for less. There are massive economies of scale in transmission. The cost per MW of delivered power is  $\frac{1}{4}$  as much for 765 kV lines vs smaller 230 kV lines, while also requiring about  $\frac{1}{4}$  as much land to deliver the same amount of power. Thus, pursuing large regional and interregional transmission creates significant value to customers.

The current administration has recognized the key role transmission plays. “Fortifying America’s electric grid is critical to the reliable and secure delivery of electricity. Under President Trump’s Executive Order, ‘Declaring a National Energy Emergency,’ the Department will identify and exercise all lawful authorities to strengthen the nation’s grid, including the backbone of the grid, our transmission system.”<sup>17</sup> Secretary Burgum explained at his nomination hearing, more transmission will be needed, regardless of future generation build. “It’s one thing to be able to generate that electricity,” said Burgum, “but if we don’t have the ability to transmit it to the places where it’s needed, that’s going to be a problem.”<sup>18</sup>

All new load and generation require grid expansion. It may have seemed like only wind and solar energy required grid expansion five or so years ago, but that was only because those resources dominated interconnection queues at that time. Now, new large loads and natural gas plants are trying to connect and they are experiencing the same slow and complicated interconnection process that results from limited capacity.<sup>19</sup> Soon we may see new nuclear, advanced geothermal, hydro, thermal, and other resources connect and these constraints will affect them as well. Regardless of one’s preference for generation type, one should support development of a much less constrained high voltage transmission grid.

Transmission expansion can be fast and help meet loads in the 2020s. While some lines will still take over 5 years to plan, permit, and build even with permitting and regulatory reforms, many types of transmission plans can increase capacity quickly. Approximately 90% of the first tranche of MISO Long Range Transmission Plans were upgrades of capacity over existing rights of way. High-performance conductors and grid-enhancing technologies can squeeze delivery capacity out of the existing network quickly and very affordably.<sup>20</sup> A number of new large lines are far along and could be energized by the end of the decade or shortly after with the help of the policy suggestions below. The sooner grid planners proactively plan for future load and generation the sooner capacity can be expanded.

On-site behind-the-meter generation is only a last resort option because it is inferior to grid power on a cost and reliability basis. Reliable electric power has always come from the pooling

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<sup>17</sup> U.S. Secretary of Energy Chris Wright. Unleashing the Golden Era of American Energy Dominance. Secretarial Order, February 5, 2025.

<sup>18</sup> Senate Committee on Energy and Natural Resources. Hearing to Consider the Nomination of the Honorable Doug Burgum to be Secretary of the Interior. January 16, 2025.

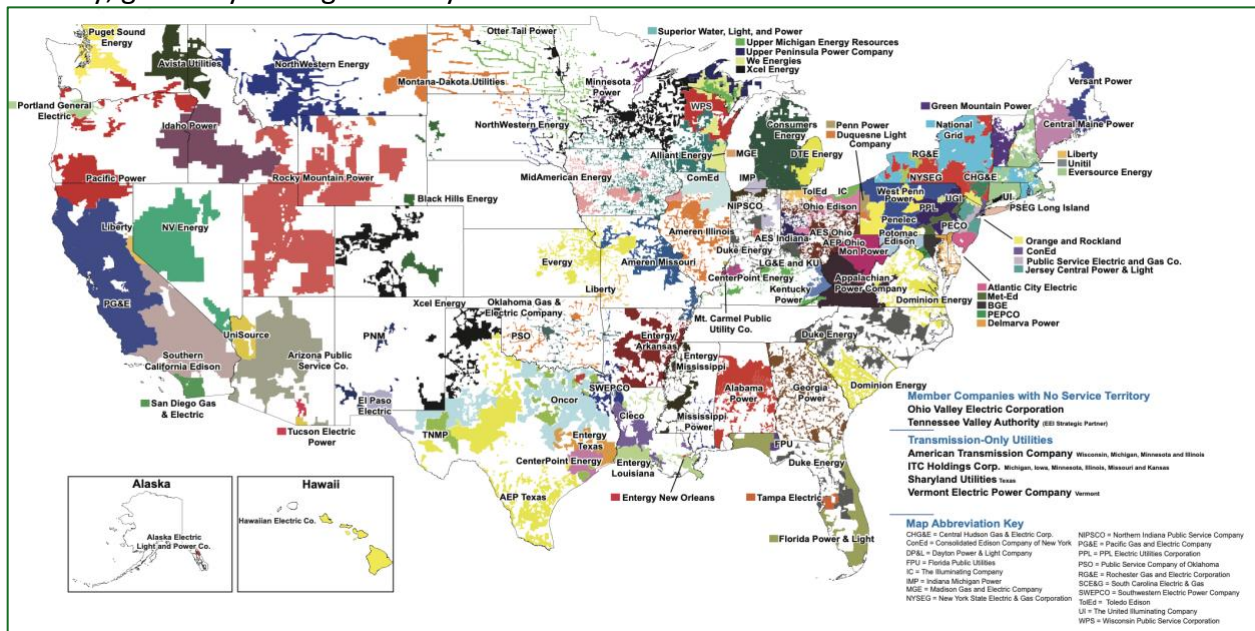
<sup>19</sup> Steven Zhang, [https://www.linkedin.com/posts/stevenqzhang\\_interconnectionfyi-interconnectionqueue-pjm-share-7394449174123044864-czcT/](https://www.linkedin.com/posts/stevenqzhang_interconnectionfyi-interconnectionqueue-pjm-share-7394449174123044864-czcT/)

<sup>20</sup> <https://ampcoalition.org/wp-content/uploads/2024/10/amp-and-watt-unlocking-the-grid-with-advanced-transmission-technologies-3834050241-e1728271773755.pdf>

of generation plants because no single power plant or resource type is always able to operate. All plants experience forced and unforced (maintenance) outages, and some require outages for refueling. On the grid, every generator backs up every generator on utility and regional power systems. Off the grid, or “behind the meter,” it is extremely expensive to build sufficient supply redundancy on a customer’s site, whether that customer is small and uses 1 kW like a typical home, or 1 GW like a new large data center. On-site behind the meter supply is likely to constitute only a small portion of total supply. In most cases of on-site generation, the plan is to build the grid connection as soon as possible, and the on-site generation will be used in the interim, and then as backup when the grid connection exists.

### III. Barriers to transmission capacity expansion

The fragmented grid we all inherited is not fit for purpose. Electricity works best on very large footprints yet almost all of it is managed locally. The power system across 39 Eastern, Southern, and Central states plus five Canadian provinces is a single physically synchronized machine called the Eastern Interconnect. A grid hiccup in Maine is felt in Louisiana, and from North Dakota to Florida. Contact between a transmission line and vegetation in Ohio shut off power for 50 million people in 8 US states and parts of Canada in 2003. The Western Interconnection includes 14 states and two Canadian provinces. Yet there are 3000 transmission owners in the country, generally managed locally and with minimal federal coordination.



Barriers to grid expansion include the “3 Ps”: planning, permitting, and paying.

*Planning:* Presently we manage transmission in the most expensive way possible: on an incremental, piecemeal basis. Shifting to proactive, multi-purpose, and large investments would

achieve more and cost less.<sup>21</sup> FERC recognized this opportunity in Orders 890 (2007), Order 1000 (2011), and 1920 (2024). Yet Order 1920 is only slowly being implemented and is being challenged in court even though it only directs a process and methodologies, and no meaningful action has taken place on interregional transmission.

*Permitting:* Traditional permitting laws and policies that affect all infrastructure also delay transmission. The dysfunctional federal backstop siting program has been no help in bringing the national interest to bear in transmission permitting as Congress intended in EPAct 2005. The state-by-state and state-only regime was recognized as a barrier to transmission in a FERC staff report during President Trump’s first term: “With respect to barriers, siting of high voltage transmission, generally an area of state jurisdiction, requires navigating each state process or multiple state processes for an interstate high voltage transmission facility.”<sup>22</sup> In today’s backstop siting regime, NEPA-required environmental reviews occur both in DOE’s designation of corridors and FERC’s action on a permit.

*Paying:* Current debates and litigation over what benefits are to be used for purposes of allocating costs are slowing transmission development. Large scale transmission benefits end-users across many states and utilities. This is true just based on reliability and economic benefits (traditional power system benefits that are germane to typical economic regulators’ scope) and ignoring any climate or energy policy benefits. Action is stalled due to lack of agreement and clarity on which benefits are appropriate to use. Related to cost allocation is accreditation of interregional transmission (providing reliability value to either the utility subscriber to the line or the line developer) which should be done but generally is not, so there is no way to reward any investor in valuable interregional capacity.

Utility incentives are also a barrier to expanding transmission because they are misaligned with consumers’ interests. The traditional vertically integrated utility earns money from capital investments in their local rate base. They generally do not earn money by enabling imports into their region—that just means someone else gets to own and profit on the generation.

According to Ham, Kay, and Hausman,

*“eliminating interregional constraints would have reduced electricity generation costs across the lower US 48 states by \$5.8 to 7.1 billion in 2022 and \$3.4 to 5.0 billion in 2023. But market integration creates winners and losers among generation companies, and we show that producers in some regions have incentives to delay or block grid integration despite the overall system benefits.”<sup>23</sup>*

Utilities also tend to earn less money if they invest in Advanced Transmission Technologies (ATTs), which may add less capital to their rate base even though these technologies can expand capacity quickly and very cost-effectively. Utility management has clear fiduciary responsibilities to maximize value for shareholders, and thus follow the economic incentives

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<sup>21</sup> See Midcontinent ISO Long Range Transmission Plans for a good model at <https://www.misoenergy.org/planning/long-range-transmission-planning/>.

<sup>22</sup> FERC staff: [https://cleanenergygrid.org/wp-content/uploads/2020/08/Report-to-Congress-on-High-Voltage-Transmission\\_17June2020-002.pdf](https://cleanenergygrid.org/wp-content/uploads/2020/08/Report-to-Congress-on-High-Voltage-Transmission_17June2020-002.pdf)

<sup>23</sup> Ham, Kay, and Hausman, <https://www.pnas.org/doi/abs/10.1073/pnas.2524463123?af=R>.

that the regulatory structure provides. Policy makers need to recognize these incentives and put policies in place to better align their incentives with consumers’.

At the same time, utilities’ key role should not be discounted. Utilities will always have a critical role and manage a large part of the power business. The dynamic that caused rates to fall dramatically when the electric utility business model was originally created are still present— achieving scale economies and spreading fixed costs across a wide user base. Moreover, most utilities do an amazing job with a very dedicated workforce balancing their reliability, affordability and other responsibilities. That said, incentives matter for all organizations, and policy makers should recognize utility incentives are misaligned with regional and interregional transmission capacity investments that would increase affordability and reliability.

#### **IV. Key Roles of States**

States have always played a key role in transmission and the bulk power system and that should continue. The balancing of state and federal roles is a theme of permitting reform, both for Clean Water Act Section 401 and for Federal Power Act updates.

The most important electricity policy initiative in the country right now is at the state level: large load tariffs. These state-jurisdictional tariffs are in the process of being updated in all the states with new large load entry. Such tariffs can shield existing ratepayers from rate increases by charging the new customers for the costs of infrastructure development. These tariffs also improve forecasts by providing better information on how much new load is “real” vs more “speculative.” And most importantly, these tariffs are the vehicle through which the well-capitalized technology industry can fund the grid expansion they desperately want. Money flows upward from the new customers to the local distribution company and into regional transmission plans at the RTO level. While the administration proposed shifting jurisdiction of this function to FERC<sup>24</sup>, only Congress could do that without years of litigation in court, and I’m not sure such a shift is necessary since states are acting and best practices are emerging and spreading via state PUC actions.

States, of course, regulate local distribution systems, generation siting, generation resource portfolios, and retail rates and service. States regulate transmission as part of bundled retail transmission service (outside of RTOs and ISOs).

Even in restructured states, those states can and should regulate power procurement in my opinion. I know some members of this Committee represent districts in the PJM region and are hearing from constituents about higher bills from energy and capacity market prices. I encourage greater state oversight over power procurement such that the wholesale federally regulated central PJM market becomes more of a residual market as RTOs and ISOs were

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<sup>24</sup> Letter from Energy Secretary Wright to FERC, <https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf> . It is not clear what was intended in terms of jurisdiction but it appears to shift significant aspects of retail service from states to FERC.

originally intended.<sup>25</sup> If load-serving entities, either on their own or by state direction, had procured power bilaterally five years ago as many people like me urged<sup>26</sup>, and as PJM is now suggesting<sup>27</sup>, their end-use customers' bills would have risen by much less. Similarly, federal regulators should reduce their intervention in state resource policies; FERC's job is not to judge state or utility resource portfolios but rather leave that to states.<sup>28</sup>

Resource adequacy by and large is a state function. The exception is where utilities filed with FERC to place the function into federally regulated tariffs, usually as part of RTO or ISO formation. NERC's authority in this area explicitly does not include resource adequacy.<sup>29</sup> It is not clear to me (as a non-lawyer my opinion is simply a lay-person's reading of the Federal Power Act) where in the Federal Power Act FERC finds the authority to play such a strong role in resource adequacy and capacity markets. Congress could review that and potentially clarify state and federal roles.

States can also participate in regional transmission and cost allocation, as FERC Order 1920 and (especially) 1920-A provided. As I argued along with a Colorado PUC Commissioner in 2021: "States are in the lead on resource choices and can provide the inputs for what transmission planners can plan. States are also in the lead on transmission siting and can head off problems by integrating siting considerations into transmission plans. States can also work to create cost allocation agreements among states. Although FERC will ultimately need to implement transmission plans and make cost allocation decisions, it can provide substantial deference to states on what is planned and who will pay for it."<sup>30</sup>

In any scenario, I believe states will continue to permit 90 percent or more of transmission. What I propose in the next section would only affect a small percentage of transmission lines.

## V. Policy Recommendations

The importance of federal jurisdiction over transmission was recently highlighted in an order by U.S. Department of Energy Secretary Chris Wright, which stated that a "core purpose" of the Federal Power Act is tied to FERC's "exclusive jurisdiction over the transmission of electric

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<sup>25</sup> Gramlich and Schneider, Appendix A, legal analysis. <https://gridstrategiesllc.com/wp-content/uploads/2024/05/ensuring-low-cost-reliability-resource-adequacy-recommendations-for-a-clean-energy-grid.pdf>.

<sup>26</sup> Gramlich and Lacey, 2020, "Who's the Buyer?" <https://gridstrategiesllc.com/wp-content/uploads/2024/05/whos-the-buyer.pdf>.

<sup>27</sup> PJM, "Powering Reliability through Market Design," 2026 <https://www.pjm.com/-/media/DotCom/library/reports-notices/special-reports/2026/20260506-powering-reliability-through-market-design.pdf>.

<sup>28</sup> <https://gridstrategiesllc.com/wp-content/uploads/2024/05/testimony-in-ferc-proceeding-on-state-policy-and-organized-markets.pdf>

<sup>29</sup> [https://acore.org/wp-content/uploads/2021/11/RA-for-a-Clean-Energy-Grid\\_Legal-Analysis.pdf](https://acore.org/wp-content/uploads/2021/11/RA-for-a-Clean-Energy-Grid_Legal-Analysis.pdf)

<sup>30</sup> Gavan and Gramlich, NRR, A New State-Federal Cooperation Agenda for Regional and Interregional Transmission, 2021, p. 8. <https://gridstrategiesllc.com/wp-content/uploads/2024/05/a-new-state-federal-cooperation-agenda-for-regional-and-interregional-transmission.pdf>

energy in interstate commerce, including the rates, terms, and conditions of transmission service, and all facilities for such transmission or sale of electric energy at wholesale in interstate commerce.”<sup>31</sup> Yet the specific authorities presently assigned to federal agencies are in some cases dysfunctional or in other cases unclear. Congress can help update and clarify these authorities and balance roles and responsibilities to meet today’s challenges.

The recommendations below have bipartisan support and share a lot in common with seven conservative groups’ “A Consumer-First Framework for Transmission Reform Market principles for a more reliable, affordable, and accountable grid,”<sup>32</sup> 40 members (half Republican, half Democratic) of the Problem Solvers Caucus “Permitting Reform Framework,”<sup>33</sup> the “Cheap Energy Act” bill supported by 131 House Democrats<sup>34</sup>, and the bipartisan SPEED and Reliability Act.<sup>35</sup>

1. Direct FERC to require interregional planning.
2. Fix the broken federal backstop permitting process. Remove the “double NEPA” in the current system, remove DOE’s unnecessary corridor designation process, and consolidate the role with FERC which has the most experience of successfully permitting linear infrastructure.<sup>36</sup> Only about 10 percent of transmission would be permitted by FERC.<sup>37</sup> While many argue for much more parity with natural gas, and this recommendation falls well short of many calls to “centralize oversight of power lines in a single federal authority,”<sup>38</sup> the fixing of the current dysfunctional federal backstop siting approach would be a beneficial and relatively modest step.
3. Improve agency permitting. Reforms to the processes and scope of NEPA and other statutes while maintaining environmental thresholds would improve transmission development. Expand statutory categorical exclusions.

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<sup>31</sup> Secretary Chris Wright, Direction that the Federal Energy Regulatory Commission Initiate Rulemaking Procedures and Proposal Regarding the Interconnection of Large Loads Pursuant to the Secretary’s Authority Under Section 403 of the Department of Energy Organization Act, October 23, 2025, available at <https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf>

<sup>32</sup> <https://c3solutions.org/wp-content/uploads/2026/04/Transmission-MeetingReadout-Shortv2.pdf>

<sup>33</sup> Problem Solvers framework: <https://problemsolverscaucus.house.gov/media/press-releases/problem-solvers-caucus-endorses-bipartisan-permitting-reform-framework> .

<sup>34</sup> <https://casten.house.gov/media/press-releases/casten-levin-seec-clean-energy-deployment-task-force-unveil-the-cheap-energy-agenda-a-roadmap-to-lower-energy-costs-for-american-families>

<sup>35</sup> Barr and Peters, <https://barr.house.gov/2025/9/rep-barr-and-peters-introduce-bill-to-slash-permitting-times-lower-energy-costs-and-prevent-blackouts>, <https://www.congress.gov/bill/119th-congress/house-bill/5600/text> .

<sup>36</sup> FERC has been successful and relatively speedy in its current permitting role: [https://www.linkedin.com/posts/david-lacerte\\_nepa-share-7437339580921475073-R\\_na/?utm\\_source=share&utm\\_medium=member\\_desktop&rcm=ACoAAAFH-s8BlKqb3\\_yKR5WLsFO4q\\_nUv1Gtz94](https://www.linkedin.com/posts/david-lacerte_nepa-share-7437339580921475073-R_na/?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAFH-s8BlKqb3_yKR5WLsFO4q_nUv1Gtz94) .

<sup>37</sup> <https://www.niskanencenter.org/what-to-keep-and-what-to-fix-in-manchins-permitting-proposal/>

<sup>38</sup> New York Times editorial board, May 8 2026. [https://www.nytimes.com/2026/05/08/opinion/permit-reform-economy-climate-us.html?unlocked\\_article\\_code=1.g1A.sWQY.Xt4UVaJQCyk&smid=url-share](https://www.nytimes.com/2026/05/08/opinion/permit-reform-economy-climate-us.html?unlocked_article_code=1.g1A.sWQY.Xt4UVaJQCyk&smid=url-share)

4. Expand and encourage greater use of federal agency tools. DOE's lead agency role under FPA 216h (labelled CITAP) can be expanded, better resourced, and used more. The Transmission Facilitation Program has proven very successful and should be expanded (and its associated budget estimate should be reviewed since it is unreasonably high). Grants and loans can help.
5. Define and clarify which benefits are appropriate for FERC to use in allocating costs. Years of litigation can be avoided if this is clarified.
6. Promote Advanced Transmission Technologies. A 1-3 year planning requirement, modeled after SPP's intermediate planning program, to enable 'speed to power' and tap into technologies ready in the near term would help. A conductor efficiency standard should be considered. Targeted performance incentives should be considered by FERC since it never implemented FPA Section 219b3 that Congress passed in 2005. Congress could increase DOE SPARK funding.<sup>39</sup>
7. Direct further generator interconnection reforms. These should include transparency of grid information, greater certainty of cost for generators, and fixing energy-only interconnection service ("Energy Resource Interconnection Service", or ERIS) to work as it was originally intended.
8. Ensure reliability value and/or partial regulated cost recovery is provided to developers of interregional transmission.

Thank you for the opportunity to testify.

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<sup>39</sup> DOE budget request p. 4: <https://barr.house.gov/2025/9/rep-barr-and-peters-introduce-bill-to-slash-permitting-times-lower-energy-costs-and-prevent-blackouts> .