

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>Inquiry Regarding the Commission’s</b>	)	
<b>Building for the Future Through</b>	)	<b>Docket No. RM21–17–000</b>
<b>Electric Regional Transmission</b>	)	
<b>Planning, Cost Allocation and</b>	)	
<b>Generator Interconnection</b>	)	

**INITIAL COMMENTS OF THE  
BUSINESS COUNCIL FOR SUSTAINABLE ENERGY**

In accordance with the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) request for comments in the subject proceeding, the Business Council for Sustainable Energy (“BCSE” or “Coalition”) respectfully submits the following comments in response to the notice of advanced proposed rulemaking, Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection.

BCSE is a coalition of companies and trade associations from the energy efficiency, natural gas, and renewable energy sectors, and also includes independent electric power producers, investor-owned utilities, public power, industrial manufacturers, commercial end-users, and energy and environmental service companies. BCSE was founded in 1992, and advocates for policies at state, national and international levels that increase the use of commercially-available clean energy technologies, products and services. The coalition’s diverse business membership is united around the revitalization of the U.S. economy and the creation of a secure and sustainable energy future for the country.<sup>1</sup> As BCSE is a diverse

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<sup>1</sup> More information about BCSE is available at: [www.bcse.org](http://www.bcse.org).

coalition, not all BCSE members endorse or take positions on the issues included in these comments.

BCSE supports FERC taking action to address electric transmission planning, cost allocation and generator interconnection processes, and encourages FERC to approach this review process in a holistic manner. The comments contained in this filing represent the position of BCSE as an organization, but not necessarily the view of any particular member with respect to any specific issue.

## **I. SUMMARY**

BCSE urges FERC to address electric transmission planning, cost allocation and generator interconnection processes. BCSE asks that FERC undertake this review in a holistic and efficient manner that takes into account the full benefits of electric infrastructure, as well as short-term and long-term goals in terms of energy reliability and resilience, grid modernization and greenhouse gas reduction and other environmental objectives, while maintaining the benefits of competitive markets. Further, BCSE notes the existing efforts by states and localities to plan and invest in electric infrastructure, and seeks to ensure that they are able to move forward while FERC explores these important topics.<sup>2</sup>

## **II. BACKGROUND**

Pursuant to its authority under section 206 of the Federal Power Act (FPA),<sup>3</sup> the Commission is considering the potential need for reforms or revisions to existing regulations to

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<sup>2</sup> Examples of such efforts include New York’s local transmission and distribution planning process implementing the Climate Leadership and Community Protection Act (“CLCPA”) and the NYISO’s rules for the identification and development of Public Policy Transmission Projects.

<sup>3</sup> 16 U.S.C. 824e (2020) (requiring that transmission rates be just and reasonable, and not unduly discriminatory or preferential).

improve the electric regional transmission planning and cost allocation and generator interconnection processes.

Approximately 10 years ago, the Commission issued Order No. 1000.<sup>4</sup> BCSE agrees with FERC that it is appropriate to review the issues addressed by that order and other transmission-related regulations and determine whether additional reforms to the regional transmission planning and cost allocation and generator interconnection processes or revisions to existing regulations are needed to ensure rates for Commission-jurisdictional service remain just and reasonable, and not unduly discriminatory or preferential.

BCSE agrees with FERC that the electricity sector is transforming as the generation fleet shifts from resources located close to population centers toward resources, including renewables, that may often be located far from load centers.

Further, the growth of new resources seeking to interconnect to the transmission system and the differing characteristics of those resources are creating new demands on the transmission system. Given these changes, BCSE agrees with FERC that it is timely and appropriate for FERC to consider whether there should be changes in the regional transmission planning and cost allocation and generator interconnection processes. BCSE also notes that many states and regions are adopting clean energy and energy efficiency deployment policies, which should also be considered as FERC considers changes to its processes.

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<sup>4</sup> *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, 136 FERC ¶ 61,051 (2011), *order on reh'g*, Order No. 1000–A, 139 FERC ¶ 61,132, *order on reh'g and clarification*, Order No. 1000–B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014).

### **III. BCSE PERSPECTIVES**

BCSE is a diverse coalition of organizations from all parts of the energy industry. While individual BCSE members have filed comments reflecting specific reforms, BCSE requests that the Commission reflect the following principles in its forthcoming rulemakings.

- BCSE encourages planning processes to adopt an integrated approach which takes into account the changes to the resource mix that will result from the long-term clean energy and climate change goals and policies that are being adopted in the public and private sector, while also respecting the investments made by existing generation to interconnect to the grid.
- State and federal-coordination, as well as intra-state coordination, is essential and BCSE supports the establishment of the Federal-State Electric Transmission Task Force.
- Scenario planning is important, and reforms should be made to better incorporate the long-term needs of the electric grid as well as long-term policy goals. At the very least, planning scenarios must account for the increase in significant climate events.
- Streamlining the interconnection queue process as part of broader planning reforms might better organize the queue such that the most viable and urgently needed projects are prioritized. This can be done through the development of criteria to analyze the viability of projects in the queue, as well as the changing energy demand.
- Finally, a number of states are actively planning and investing in electric grid infrastructure to meet their reliability, resilience and climate change policies.

Understanding that FERC's rulemaking and implementation process may take several years, we ask that FERC adopt a flexible approach that accommodates individual

states and local policy preferences and allow those processes and projects to move forward, as appropriate.

## V. CONCLUSION

BCSE thanks the Commission for its consideration of these important issues and requests that the Commission consider these guiding principles in its transmission reforms.

Respectfully submitted,



/s/ \_\_\_\_\_

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Date: October 12, 2021

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this pleading has been served this day upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC this 12<sup>th</sup> day of October 2021.

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