BCSE Comments on DOE's Speed to Power Initiative
November 19, 2025

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to provide these comments in response to the Department of Energy's (DOE) Request for Information (RFI) on the *Speed to Power Initiative*. BCSE commends DOE for recognizing the urgent national need to accelerate the deployment of large-scale generation and transmission infrastructure to meet rising power demand while maintaining affordability, reliability, and resilience. This submission also integrates recent BCSE recommendations on grid innovation and near-term capacity expansion to complement DOE's long-term strategy.

About the Business Council for Sustainable Energy (BCSE)

Founded in 1992, BCSE is a coalition of companies and trade associations from the energy efficiency, natural gas, renewable energy, energy storage, and sustainable transportation sectors. The Council advocates for policies that expand the use of clean, reliable, and affordable energy technologies to achieve economic growth, energy security, and environmental stewardship. BCSE's members include utilities, independent power producers, technology providers, equipment manufacturers, and service firms across the energy value chain, collectively representing over $3.8 trillion in market capitalization and nearly one million employees nationwide.

The Speed to Power Imperative

DOE's Speed to Power initiative arrives at a pivotal moment. National electricity demand is increasing rapidly due to data centers, AI development, manufacturing growth, and increased electricity use by consumers and businesses. BCSE supports DOE's focus on achieving both speed and scale, emphasizing that the United States must deploy new generation while maximizing the capacity and performance of its existing grid infrastructure.

Integrating Flexible Generation and Grid Innovation

Flexible, dispatchable generation and grid modernization are critical to U.S. national security and competitiveness. DOE should support a balanced portfolio—renewables, natural gas, demand-side solutions, nuclear, and storage—and consider the multiple benefits of co-located and hybrid projects. Reforms to streamline permitting and enhance interconnection efficiency will help bring capacity online faster and at lower cost. In addition, it is important for DOE to help drive progress on load interconnection processes to recognize the flexibility that may be provided through load management techniques or co-located of flexible generation.

Accelerating Deployment Through Grid Innovation and Near-Term Capacity Solutions

To deliver near-term capacity and reliability benefits while new large-scale generation is under development, DOE should focus on the following complementary innovation tracks:

Modular Resilience and Reliability Assets – BCSE encourages DOE to expand programs that accelerate deployment of standardized, modular assets such as battery energy storage systems (BESS), fuel cells, and microgrids. These solutions can be deployed quickly across federal lands

and critical infrastructure (schools, military bases, and hospitals) to enhance resilience and grid flexibility.

Demand-Side Flexibility and Distributed Energy Resource (DER) Aggregation – DOE should promote aggregation and market participation of DERs to defer costly transmission upgrades, improve peak-load management, and provide consumer savings. Coordination with states and regional grid operators can optimize DERs for real-time grid needs.

Digital Transformation and Grid-Enhancing Technologies (GETs) – DOE can unlock latent grid capacity by investing in dynamic line rating, advanced power flow controls, reconductoring, and digital substations. Support for digital twin and AI-based system visibility tools can help utilities maximize the performance of existing assets and improve load forecasting.

AI Applications for Energy Management and Grid Coordination – BCSE urges DOE to integrate AI in grid operations, manufacturing, and project permitting. AI-enabled forecasting can optimize system balancing, accelerate interconnection review, and enable data centers and industrial loads to flex dynamically during periods of stress. DOE should coordinate with Congress to ensure these technologies are supported through funding, oversight, and commercialization pathways.

By embracing these strategies, DOE can accelerate capacity deployment, strengthen resilience, and modernize the grid while advancing its long-term infrastructure agenda. Please see the letter to Congress led by the National Electrical Manufacturers Association (NEMA) that BCSE signed in September 2025 for more information here.

Financing, Supply Chains, and Workforce Readiness

Project acceleration depends not just on policy but also on enabling conditions—capital, supply chain logistics, and skilled labor. BCSE recommends DOE expand its research, development, deployment and demonstration (RDD&D) funding and its loan guarantee programs, as well as incentivize domestic component manufacturing, and support regional workforce development initiatives that align training with near-term grid modernization needs.[1] BCSE supports the bipartisan Veterans Energy Transition (VET) Act, H.R. 4105, which aims to help military veterans find meaningful careers in the energy and advanced manufacturing sectors and would address workforce shortages in the energy industry by leveraging existing transition programs.

State-Level Collaboration and Economic Development Alignment

Integrating energy planning with state economic development goals is critical. BCSE recommends DOE coordinate with the National Governors Association (NGA), the National Association of Regulatory Utility Commissioners (NARUC), and the National Association of State Energy Officials (NASEO) to align planning processes and share data to identify where load growth, siting opportunities, and transmission investments intersect most productively.

[1] Please see BCSE's recommendations for fiscal year 2026 funding at the Department of Energy. https://bcse.org/images/2025%20FPC/Senate%20BCSE%20FY2026%20EW%20Letter%20FNL.pdf

Expanding and Modernizing Electric and Natural Gas Transmission

Rapid national load growth—driven by data centers, advanced manufacturing, electrified industry, and AI—requires DOE leadership to accelerate development of both high-capacity electric transmission and modernized natural gas infrastructure. The United States already relies on one of the world's most extensive natural gas delivery systems, with hundreds of thousands of miles of transmission pipelines that underpin electric reliability, industrial production, and heating. Expanding and upgrading this network—alongside new interregional electric transmission—will ensure firm, affordable fuel supply during peak load conditions and provide essential flexibility and resilience as power demand accelerates.

DOE can resolve the primary barriers to deployment—siting, permitting, market design, and funding—through coordinated federal action. Streamlined multi-state siting and timely, consistent environmental reviews would significantly accelerate both electric and natural gas infrastructure.

Related to electric transmission, DOE, working with FERC and CEQ, should establish coordinated, time-bound permitting for critical corridors and ensure consistent NEPA implementation across agencies.

Federal market reforms are also needed. DOE should support FERC efforts to require standardized interregional planning, transparent cost allocation, and optimization of existing and future interties—ensuring that national reliability and resilience benefits are fully valued and compensated across regions.

Finally, DOE can unlock capital for large electric and gas transmission projects by deploying federal lending tools, expanding public-private financing models, providing early-stage risk support, and acting as an anchor customer where appropriate.

Permitting, Interconnection, and Market Reforms

Drawing from BCSE's comment submission to the Federal Energy Regulatory Commission in April 2025 on large load issues,[2] the Council urges DOE to lead interagency coordination on interconnection reform, increase transparency in queue data, and standardize application procedures. Streamlining environmental reviews and expanding categorical exclusions for proven technologies can help deliver capacity faster while maintaining environmental integrity.

Policy Integration for Affordability and Growth

BCSE's 'State-Level Solutions to Keep Energy Costs Down'[3] highlights the importance of policy alignment across jurisdictions. DOE should foster cooperative funding for regional transmission and incentivize flexible utility planning that integrates demand-side management and

[2] Please see: https://bcse.org/images/2025%20FPC/BCSE%20Comments%20to%20FERC%20Co%20Location%20Docket%204%2023%2025.pdf

[3] Please see: https://bcse.org/state-level-solutions-keep-energy-costs-down/

distributed resources early in economic development processes. BCSE is pleased to share examples of innovation across the country with project examples[4] as well as a searchable digital platform to track projects and facilities.[5]

Innovation and Competitiveness in the AI Era

U.S. leadership in AI, manufacturing, and digital innovation depends on a robust, low- carbon and resilient grid. DOE should encourage AI-driven grid management systems, smart manufacturing, and data-sharing frameworks to maintain U.S. global competitiveness.

Conclusion

The Business Council for Sustainable Energy commends DOE for advancing the Speed to Power initiative and urges the Department to integrate these near-term, technology-based strategies alongside long-term infrastructure planning. By coordinating with Congress, states, industry and communities, DOE can accelerate deployment of scalable solutions that improve reliability, enhance resilience, and keep energy affordable for all Americans. Please contact BCSE at bcse@bcse.org with any questions or feedback on the BCSE submission.

[4] Please see: https://bcse.org/state-level-solutions-keep-energy-costs-down/

[5] Please see: https://bcse.org/join-our-coalition/#coast-to-coast