

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

Notice of Proposed Rulemaking	)	
Building for the Future Through Electric	)	Docket No. RM21-17-000
Regional Transmission Planning and Cost	)	
Allocation and Generator Interconnection	)	

**INITIAL COMMENTS OF THE NATIONAL ASSOCIATION OF  
STATE UTILITY CONSUMER ADVOCATES**

The National Association of State Utility Consumer Advocates (“NASUCA”), a voluntary association of 60 utility consumer advocate offices, appreciates the opportunity to provide these Comments in response to the issues raised in the Federal Energy Regulatory Commission’s (FERC or Commission) Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection Notice of Proposed Rulemaking RM 21-17-000 (“Transmission NOPR”).<sup>1</sup> NASUCA represent the interests of utility consumers in 44 states, the District of Columbia, Puerto Rico, Barbados and Jamaica.<sup>2</sup> The number of inquiries in the NOPR are large and complex and the interests of individual NASUCA members in the issues addressed in the Transmission NOPR vary.<sup>3</sup> However all of our members agree on the following facts: electric service is an essential service and consumers’ lives and livelihoods depend on such service being reliable, resilient, and affordable.

NASUCA applauds the Commission’s efforts to conduct an open and transparent investigation that allows for public input and to proactively examine whether, and if so which,

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<sup>1</sup> *Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection*, Notice of Proposed Rulemaking, 179 FERC ¶ 61,028 (2022).

<sup>2</sup> NASUCA’s full members are designated by the laws of their respective jurisdictions to represent the interests of utility consumers before state and federal utility regulators and in the courts. NASUCA’s associate and affiliate members are recognized utility consumer advocates in their respective jurisdictions.

<sup>3</sup> Individual NASUCA consumer advocate members reserve the right to file separate comments regarding the issues discussed in the NOPR.

policy changes are needed in order to ensure that the future grid is designed appropriately and cost-efficiently to ensure service remains reliable and resilient, rates remain just and reasonable, and competition remains a priority.

NASUCA's comments are not intended to address each issue raised in the Transmission NOPR. Rather the comments identify several important policy principles to which the Commission should adhere as it moves forward with any changes pursuant to this rulemaking. These base principles are necessary to ensure the Commission's planning and cost allocation policies are in the public interest, appropriately protective of consumer rights, and that any changes made to the policies are warranted.

## **I. NASUCA POLICY STATEMENT**

As the primary basis for the NASUCA responses to the questions raised in the Transmission NOPR, NASUCA attaches its recently adopted transmission policy statement, *Resolution 2022-01 – Urging Development of Consumer Protection Policies for Interconnection and Electric Transmission and Distribution Planning and Development*, (NASUCA Resolution) passed by the membership at the 2022 NASUCA Mid-Year Meeting in Indianapolis, Indiana, June 12, 2022.<sup>4</sup> (Attachment A) Given the geographic, policy and political diversity of the full NASUCA membership and the diversity of regulatory structures under which NASUCA members must exercise their authority, this consensus statement of basic consumer protection principles should provide the Commission a baseline for understanding broad consumer concerns. In the comments below, relevant NASUCA policy is added in italics.

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<sup>4</sup> <https://www.nasuca.org/wp-content/uploads/2021/10/2022-01-Consumer-Protection-Policies-for-Transmission-and-Distribution-Planning-6-12-2022.pdf>.

## II. COMMENTS

In considering any expanded long-term regional and interregional transmission planning and cost allocation process reforms, the Commission must balance multiple, sometimes conflicting considerations. However, as consumers ultimately both pay for the costs of any generation and transmission development and bear the brunt of impacts if the lights go out, adequate consumer protections are essential to any process reforms.

The transmission system is now controlled in most parts of the country by a regional entity and not state public utility commissions. Many of these regional entities operate with little to no meaningful consumer representation in the decision-making process.<sup>5</sup> While additional focus is due for longer-term planning and interregional planning, to NASUCA members this represents another forum where decisions will be made and costs will be incurred that will be paid by consumers, but where NASUCA members have little opportunity to provide input or to influence decisions. And for those NASUCA member states that are not already in formal Regional Transmission Organizations (“RTOs”), this expansion without representation must surely cause some hesitation in whether to support joining an RTO if one was proposed.

NASUCA does support, subject to the concerns listed below and in the NASUCA Resolution, expanding the process by which long-term transmission planning decisions are made. Planners must address the changing generation and distributed technology mix and the increasing frequency and impacts of severe storms and other natural disasters. A longer-term view and more attention to interregional planning are warranted.

Broadly speaking, NASUCA policy and comments speak to open and transparent processes, the need for consumer representation, processes that maximize use of existing

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<sup>5</sup> Except for large commercial or industrial customers with the resources and personnel to represent their own interests in the myriad of regional processes.

transmission resources before committing to build new transmission resources, not using an overbroad definition of benefits when evaluating transmission projects, processes that minimize cost when building transmission is determined to be necessary, eliminating unnecessary and costly administrative incentives, and giving due attention to fact that historically transmission has often been located in socially and environmentally disadvantaged communities.

**i. Reliability, resilience, and cost (affordability)**

*Transmission planning processes should be robust to optimize siting in areas of highest economic, social, and network value; network planning should be holistic and incorporate both expected generation development and consumer demand projections.*

*Network planning should account for the severity of environmental and weather conditions, including hurricanes, tornadoes, storms, fires, and other natural disasters.*

*Transmission planning should be data driven and should support concepts of just and reasonable rates and the prevention of undue discrimination.*

*Planning policies should be nimble enough to account for regional, state, and local considerations because there are regional, state, and even local differences in policies, consumer growth, generation mix, and community impacts that dictate the tailoring of policies to the specific needs of the area. Relatedly, the need for change differs by area, and not every region necessarily needs a complete transformation in its transmission planning and cost allocation policies.*

NASUCA supports policy changes that ensure the future grid is designed appropriately and cost-efficiently, service remains reliable and resilient, rates remain just and reasonable, and competition remains a priority, but cautions that policies should only be changed if the outcomes benefit customers. NASUCA recognizes that we must ensure that a more robust and resilient grid is planned to meet customer needs when considering a changing generation mix and the increased availability and use of distributed technologies, while also acknowledging that state and federal policies that may not align. It is also clear that increasingly frequent and severe occurrences of storms, temperature variations, wildfires, flooding, and other natural disasters are having increased direct and indirect impact on consumers. Some level of reexamination of current planning

processes is warranted to ensure we are building to the needs and challenges going forward. Furthermore, additional focus on interregional transmission is overdue. To that end NASUCA supports the current Transmission NOPR process.

It must also be recognized that transmission cost is one of the fastest growing charges on consumer bills. While the reliability and resilience of the transmission system are paramount concerns, if no one can afford their power bill we will have failed. The Commission must only make reforms to the extent consumers benefit in the form of lower costs, increased resilience and increased transparency and participation.

**ii. Consumer representation at the RTO board, stakeholder process and FERC is necessary.**

*Effective and early public participation is necessary so that transmission planners can understand the impacts of their decision-making on the public.*

*Consumer advocate groups should have support to participate actively in regional transmission planning processes.*

The Commission must not approve transmission planning reforms that only allow well-funded organizations to participate in the process. NASUCA believes that the Commission is authorized under the Federal Power Act to institute reforms necessary to ensure that consumer advocates have not just the opportunity but the ability to meaningfully participate in the transmission planning processes delegated to regional transmission organizations, independent system operators, and other transmission planning organizations. NASUCA also believes that ensuring consumer advocate representation in these regional processes is a necessary reform. The Commission has imbued RTOs with broad power over costs that will ultimately be assigned to consumers but has not yet given consumer advocates the ability to meaningfully participate in the RTO process. One exception is the Consumer Advocates of the PJM States (“CAPS”), but even CAPS was created by the RTO members and not ordered by the Commission, has only one person

that must monitor the entirety of PJM, and is limited to only the stakeholder process and cannot appeal decisions to the Commission. CAPS certainly serves an important role, but an expanded role would more fully serve the needs of consumers in fair consideration of the challenges that are being addressed in this Transmission NOPR.

It should also be noted that simply making funding available to existing consumer advocate offices does not solve this problem. Many consumer advocate offices are small and resource constrained. By example, offering travel support to an office when there is no one available to focus on the issues or to travel for a meeting is not a solution. A dedicated advocate presence is a necessary, but not necessarily sufficient, reform that the Commission should pursue.

Consumer advocates must have a meaningful role and funding to execute that role to ensure future transmission costs and consumer rates are considered just and reasonable. This must include funding for an entity to represent consumer advocates in the stakeholder process and with the ability to seek redress with the Commission on decisions. This also includes having a seat reserved on RTO boards for someone with significant experience representing consumers. Right now, these rights are only reserved for transmission owners or entities with sufficient funding to participate. The Commission should not perpetuate this perverse reality. Any reform must include a requirement for RTO funding for a consumer advocate member representative with adequate funding for robust participation in the RTO planning process.

### **iii. Independent Transmission Monitor**

*Many NASUCA members are interested in exploring the creation of Independent Transmission Monitors in both RTO and non-RTO regions. Like Independent Market Monitors, the Transmission Monitors should be attuned to the specific needs of, and data associated with, the regions that they oversee.*

Current RTOs are dominated by processes that are less than open and in which outside participants find it difficult to participate. Modeling the transmission needs of the future will

depend on the assumptions used in the planning model. Those who control that model and the assumptions that are used to reach decisions in that model becomes paramount in deciding what does and does not get built. NASUCA members have expressed interest in having some independent entity available to ensure transparent planning and fair assumptions are used in the process. And more importantly to ensure that all lower cost options to use the existing transmission system are addressed before simply moving to a decision to build more transmission. As addressed in the next section, available and cost-effective grid enhancing technologies exist today, but are not deployed to the benefit of consumers. If current processes were truly independent this would not be the case. Some form of an Independent Transmission Monitor, that would function like current Market Monitors, would help ensure that consumers know that all cost beneficial options have been explored. It could take input from a wide range of sources, ensure that all reasonable options to meet a defined need have been explored, and provide some interface with the public. The Transmission Monitor can also serve as a check for the Commission about whether adequate and transparent inputs were used in determining any outcome.

- iv. Planning must ensure the opportunities to deploy grid enhancing technologies and non-wires alternatives are maximized before more expensive transmission is built.**

*Network planning should examine cost-effective alternatives to infrastructure development including the siting of distributed generation and the use of grid enhancing technologies*

The Commission must ensure that we maximize the use of our existing transmission assets before we build new ones. There are grid enhancing technologies (GETS) and other non-wires alternatives that are available and cost effective today, but that are not deployed to the benefit of consumers through the current RTO process. Current processes tend to be highly dependent on what members propose to build and not necessarily what is best for the objective. The Commission

should only move to issues of reforming the process of long-term planning and interregional planning after it has instituted reforms that ensure these least cost options are maximized.

**v. Competition should be the primary method for determining who builds transmission projects**

*Planning principles should support competition in the building of RTO-identified transmission projects. Competition helps ensure the adoption of efficient, cost-effective solutions that lead to lower prices for consumers. FERC's transmission planning and interconnection policies should continue to support robust competition and should temper the ability of incumbent transmission providers to expand their monopoly control over the electric grid.*

*In states or regions in which incumbent transmission providers are insulated from competition, FERC must establish processes to ensure that transmission plans are cost-effective and transmission development costs are reasonable, carefully managed, and more frequently reviewed to ensure the transmission projects are still needed and cost justified.*

The Commission proposes a conditional right of first refusal (“ROFR”) and inquires whether going back to a pre-Order 1000 ROFR is preferred. NASUCA answers in the negative. NASUCA believes that allowing entities to compete on price to win the opportunity to build defined projects will result in the lowest cost for consumers. In a process arguably controlled by incumbent transmission owners, eliminating the opportunity to bring competitive suppliers and competitive pressures into play for the benefit on consumers is the wrong policy direction. Certainly, going back to a pre-Order 1000 ROFR is unacceptable.

**vi. Construction Work in Progress (and other administrative incentives) must be eliminated.**

*Transmission incentives under FERC Order 679 should not be granted where there is no need or justification for such incentives, where projects would be built absent an incentive, and where such incentives only serve to unnecessarily increase the cost of building needed transmission for consumers. To the extent incentives are offered, they should be accompanied by cost protections, including time- and scope-limits to ensure that consumers are charged only for the incentive necessary to incent the development of a needed project that would not be built absent the incentive*



*Consumers should be protected from unreasonable costs and risks. Poor planning can lead to imprudent transmission and interconnection, unnecessary spending, poorly-sited transmission facilities, and stranded assets that are not used and useful in the provision of utility service. Neither these risks nor the associated costs should be passed onto consumers.*

NASUCA has long opposed the Commission's use of incentives to reward transmission owners for joining RTO. Likewise, NASUCA has opposed ratemaking incentives like higher than market returns on equity, hypothetical capital structures and the abandoned plant incentive. All these unnecessarily shift costs and risk to consumers and increase consumer rates. The Commission policy allowing construction work in progress ("CWIP") as a ratemaking tool likewise shifts financial risk to consumers. As noted by Commissioner Christie, consumers simply become the bank for the utility and must pay the utility profit for the pleasure.<sup>6</sup> CWIP increases consumer rates even though the increase is paying for a project that is not in service and not used and useful to the consumer. CWIP reduces a project's financial risk by shifting that risk to consumers, yet consumers are not compensated for taking on this risk. Finally, it has been argued that CWIP results in a lower overall cost than using the allowance for funds used during construction ("AFUDC") ratemaking method, (i.e., moving costs into rates immediately costs consumers less than paying the carrying charges on those costs until the project is complete). But this is highly dependent on the consumers' discount rate. Most consumers prefer to keep their money in their pocket today rather than using it to pay for a project, especially when that project will not provide service until a later date. Consumers would prefer to use tomorrow's dollars to pay for tomorrow's project. Regulation is concerned with issues of intergenerational equity, and in this case, this warrants eliminating CWIP as funding for projects

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<sup>6</sup> Commissioner Christie's Concurrence in NextEra Energy Transmission Southwest, LLC regarding Transmission Incentives, ER22-1886

**vii. Benefits and cost allocation**

*The methods for calculating and assigning benefits should be based on objective, measurable, clear, and specific metrics, and such metrics should be developed in concert with the consumers who may ultimately pay those costs.*

*Cost-causation regulatory principles should be followed to protect consumers from paying charges for transmission services that do not provide benefits to those consumers.*

*Cost allocation must reflect the distribution of costs and benefits associated with projects. Cost causation principles require that the entities paying the costs benefit from the investment and that their share of costs is commensurate with the benefit that they receive.*

*Transmission planning should be data driven and should support concepts of just and reasonable rates and the prevention of undue discrimination.*

In defining potential benefits that may be considered in evaluating a transmission project, NASUCA members urge the Commission to ensure that it does not define benefits so broadly that every transmission project would qualify to be built. A process that open-ended has zero restraint and therefore zero reasonable consumer protections. Overly broad benefit definitions also reduce the ability to maintain any rational relationship between cost allocation and identifiable beneficiaries. The Commission must not end up at a point where the idea of benefits is so nebulous that no specific beneficiaries can be identified for cost allocation purposes.

**viii. Cost allocation – state agreement process**

The Commission proposes a “state agreement process” as one means to determine possible cost allocation recommendations for interregional projects. If the Commission moves forward with this proposal the Commission must be clear about what constitutes an adequate state process and must clearly recognize that state consumer advocates are statutorily created and are therefore also “state” actors. In states with statutory or identified state consumer advocates, the Commission must set a clear standard that any approved state cost allocation process must include agreement by the state utility consumer advocate. At minimum the Commission should not approve any cost

allocation proposal without a showing that state consumer advocates have been given a meaningful opportunity for substantive input into the proposal.

**ix. Protections for socially and environmentally disadvantaged communities.**

*Energy infrastructure has sometimes been sited in economically, socially, and environmentally disadvantaged communities. Planning should be sensitive to the local experience of communities where transmission may be located and should include considerations of whether the project development would exacerbate existing inequities*

NASUCA supports reforms to the transmission planning process that would have the effect of bringing greater awareness of the issues around historical transmission siting in economically, socially and environmentally disadvantaged communities. Planning processes must make some value judgements about where projects will be built as part of creating a cost profile for evaluation. That process should make every effort to design in a way that does not further exacerbate inequities.

**x. Federal agencies and federal lands**

*Federal Agencies should work together to streamline transmission siting on Federal lands*

Where transmission has been identified as potentially beneficial, one unique challenge that must be addressed is running transmission lines over federal lands. Numerous federal agencies have jurisdictional control over the land and the bureaucratic challenges of siting transmission on federal lands are well known. NASUCA recognizes that this may be outside of the Commission's control in this proceeding, it still goes without saying that the Commission should work closely with its other federal counterparts to make every effort to streamline the process of siting transmission on federal lands.

### III. CONCLUSION

NASUCA appreciates the opportunity to submit these comments. NASUCA respectfully requests that FERC consider the principles identified herein and identified in the attached NASUCA transmission policy resolution during its deliberations.

Respectfully submitted,

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David Springe  
Executive Director  
NASUCA  
8380 Colesville Road, Suite 101  
Silver Spring, MD 20910  
301-589-6313  
[David.Springe@NASUCA.org](mailto:David.Springe@NASUCA.org)

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**Attachment A**

NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES  
RESOLUTION 2022-01

**URGING DEVELOPMENT OF CONSUMER PROTECTION  
POLICIES FOR INTERCONNECTION AND ELECTRIC TRANSMISSION AND  
DISTRIBUTION PLANNING AND DEVELOPMENT**

*Whereas*, electric service is an essential service; and

*Whereas*, consumers' lives and livelihoods depend on such service being safe, reliable, and affordable; and

*Whereas*, the electric system exists to serve customers; and

*Whereas*, consumers ultimately both pay for the costs of any generation, transmission, and distribution development and bear the brunt of impacts if the lights go out; and

*Whereas*, the electric system must be well-planned for consumer system demands and needs and be based on cost-efficient planning principles, and the planning process must provide for the opportunity for meaningful input by consumers; and

*Whereas*, increased interconnection of distributed energy resources can impact system requirements; and

*Whereas*, electric system infrastructure must be able to withstand extreme weather events; and

*Whereas*, stronger interregional connections can help increase overall electric system reliability and resilience; and

*Whereas*, transmission and distribution investment is necessary and advantageous for the electric system to meet reliability and public policy climate objectives, and in particular, to allow the interconnection of non-fossil fuel generation resources; and

*Whereas*, competitive bidding for transmission services should result in greater innovation and lower prices for consumers. In addition, competitive bidding should improve operating efficiencies and will shift business risk from monopoly customers to competitive transmission providers. Competition for transmission services should enhance service quality, should make the winning providers more responsive to consumer needs, and should increase owner accountability to consumers and regulators; and

*Whereas*, grid-enhancing technologies can help offset the need for infrastructure investment; and

*Whereas*, existing infrastructure should be used in future planning and development when it is in the best interest of customers to do so; and

*Whereas*, significant investment comes with significant responsibility because many consumers are already facing economic or environmental disadvantages and/or already escalated transmission charges; and

*Whereas*, individuals will bear the burdens of these investments, including societal, environmental, and economic impacts on our communities from siting facilities; and

*Whereas*, NASUCA members are concerned that FERC could over broadly define benefits as a method of unreasonable or unfair cost socialization; and

*Whereas*, NASUCA acknowledges that its individual member states have different policy priorities and different approaches to achieve those policy priorities; and

*Whereas*, adequate consumer protections are essential to any process reforms; and

*Whereas*, generator interconnection and transmission and distribution development policies must be prepared to address not only interregional issues of large generation sited farther from the customers it will serve, but the inverse issue of increased interconnection of distributed energy resources sited near load or behind the meter.

**Now, therefore, be it resolved**, the National Association of State Utility Consumer Advocates (“NASUCA”) supports policy changes to ensure that the future grid is designed appropriately and cost-efficiently to ensure service remains reliable and resilient, rates remain just and reasonable, and competition remains a priority, but cautions that policies should only be changed if the outcomes benefit customers and finds that the following principles are essential to ensuring that interconnection, and transmission and distribution development plans and policies both benefit and protect customers:

1. Any changes to policies and rules impacting transmission and distribution development should be made in an open and transparent manner that allows for ongoing public input.
2. Cost-causation regulatory principles should be followed to protect consumers from paying charges for transmission services that do not provide benefits to those consumers.
3. Cost allocation must reflect the distribution of costs and benefits associated with projects. Cost causation principles require that the entities paying the costs benefit from the investment and that their share of costs is commensurate with the benefit that they receive.
4. The methods for calculating and assigning benefits should be based on objective, measurable, clear, and specific metrics, and such metrics should be developed in concert with the consumers who may ultimately pay those costs.
5. Transmission and distribution plans should be based on reasonable, transparent, and well-tested planning assumptions (e.g., vetted by state regulatory processes), shared with the representatives of those who are impacted by the planning decisions, informed by feedback from the public, developed with consideration given to alternative solutions, forward-looking, and holistic in that they consider multiple needs;
6. Consumer advocate groups should have support to participate actively in regional transmission planning processes;<sup>7</sup>
7. Consumers should be protected from unreasonable costs and risks. Poor planning can lead to imprudent transmission and interconnection, unnecessary spending, poorly-sited

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<sup>7</sup> For example, the Consumer Advocates of the PJM States (CAPS), <http://www.pjm-advocates.org/>, is funded through the PJM budget.

transmission facilities, and stranded assets that are not used and useful in the provision of utility service. Neither these risks nor the associated costs should be passed onto consumers.

8. Energy infrastructure has sometimes been sited in economically, socially, and environmentally disadvantaged communities. Planning should be sensitive to the local experience of communities where transmission may be located and should include considerations of whether the project development would exacerbate existing inequities.
9. Transmission planning processes should be robust to optimize siting in areas of highest economic, social, and network value; network planning should be holistic and incorporate both expected generation development and consumer demand projections.
10. Network planning should account for the severity of environmental and weather conditions, including hurricanes, tornadoes, storms, fires, and other natural disasters.
11. Network planning should examine cost-effective alternatives to infrastructure development including the siting of distributed generation and the use of grid enhancing technologies.
12. The principle of used/useful should remain the core of transmission policies and customers should not be required to bear the costs of plant that does not go in-service.
13. Transmission incentives under FERC Order 679 should not be granted where there is no need or justification for such incentives, where projects would be built absent an incentive, and where such incentives only serve to unnecessarily increase the cost of building needed transmission for consumers. To the extent incentives are offered, they should be accompanied by cost protections, including time- and scope-limits to ensure that consumers are charged only for the incentive necessary to incent the development of a needed project that would not be built absent the incentive.
14. The initial risks of bidding and planning for projects should be borne by the developer, not the customers, and developers should not be allowed to pass on to consumers the planning costs of projects that bid into but are not chosen for regional transmission plans as these costs are traditional business risks.
15. As appropriate, generators and/or developers should continue to pay some or all interconnection costs because they are the primary beneficiary of the activity: interconnection is a necessary component to bringing power to the market/load.
16. Federal transmission planning cost allocation and generator interconnection policies should be complementary to and not supplant state jurisdiction over regional resource planning decisions.

17. Federal and state jurisdiction should be clearly defined so that there is no regulatory gap and so that all projects receive regulatory scrutiny of their need, prudence, and costs.<sup>8</sup> The Utility should bear the burden of proof that transmission facilities are properly included in a FERC-approved tariff before the utility charges consumers.
18. States, as appropriate, should retain the primary authority and control over the siting of transmission facilities. Transmission lines in national transmission corridors and elsewhere can and should include an evaluation of the costs and benefits of the proposed transmission project to consumers of that state, and to the extent transmission is regionally planned, there should be a robust process for state input into transmission siting and cost allocation decisions.
19. Regional transmission planning should incorporate and support, rather than supplant or undermine, state policies. Because states are charged not only with regulating their share of the energy industry but also with looking after the safety, health, and welfare of their citizens, energy development is but one consideration in a larger set of considerations for the state. Federal policies that supplant state policies may lead to unintended consequences for other important areas of state responsibility.
20. Planning policies should be nimble enough to account for regional, state, and local considerations because there are regional, state, and even local differences in policies, consumer growth, generation mix, and community impacts that dictate the tailoring of policies to the specific needs of the area. Relatedly, the need for change differs by area, and not every region necessarily needs a complete transformation in its transmission planning and cost allocation policies.
21. Some but certainly not all NASUCA members' regions are served by a regional transmission organization or an independent system operator (hereafter, collectively referred to as "RTOs"). For those states where a utility or utilities are part of an RTO, those RTOs and state and federal officials should ensure that there is an independent entity within each jurisdiction that is charged with reviewing interconnection concerns and complaints.
22. Many NASUCA members are interested in exploring the creation of Independent Transmission Monitors in both RTO and non-RTO regions. Like Independent Market Monitors, the Transmission Monitors should be attuned to the specific needs of, and data associated with, the regions that they oversee.
23. Planning principles should support competition in the building of RTO-identified transmission projects. Competition helps ensure the adoption of efficient, cost-effective

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<sup>8</sup> A 2019 report prepared for the Consumer Advocates of the PJM States found that capital expenditures for supplemental projects— projects not required for compliance with PJM operational performance, system reliability, or economic criteria—increased by more than 1,000% from 2013 through 2020. *See* Continuum Associates, Expert Consultation on PJM Supplemental Transmission Projects: Standards and Oversight 1, September 13, 2019, [https://0201.nccdn.net/4\\_2/000/000/076/de9/final-report---caps---pjm-supplemental-transmission-projects\\_wo\\_.pdf](https://0201.nccdn.net/4_2/000/000/076/de9/final-report---caps---pjm-supplemental-transmission-projects_wo_.pdf); *see also* PJM, TEAC Project Statistics, May 12, 2020, Slide 6, <https://pjm.com/-/media/committees-groups/committees/teac/2020/20200512/20200512-item-10-2019-project-statistics.ashx>



solutions that lead to lower prices for consumers. FERC's transmission planning and interconnection policies should continue to support robust competition and should temper the ability of incumbent transmission providers to expand their monopoly control over the electric grid.

24. In states or regions in which incumbent transmission providers are insulated from competition, FERC must establish processes to ensure that transmission plans are cost-effective and transmission development costs are reasonable, carefully managed, and more frequently reviewed to ensure the transmission projects are still needed and cost justified.
25. Transmission planning should be data driven and should support concepts of just and reasonable rates and the prevention of undue discrimination.
26. Effective and early public participation is necessary so that transmission planners can understand the impacts of their decision-making on the public.
27. Federal Agencies should work together to streamline transmission siting on Federal lands.

**Be it further resolved,** that NASUCA authorizes its Executive Committee to take appropriate actions consistent with the terms of this resolution. The Executive Committee shall advise the membership of any proposed action prior to taking such action, if possible. In any event, the Executive Committee shall notify the membership of any action taken pursuant to the resolution.

Submitted by the Electric Committee

Approved:

2022 NASUCA Mid-Year Meeting

June 12, 2022