



## I. JOINT COMMENTS OF THE RAIL ELECTRIFICATION COUNCIL AND NEXTGEN HIGHWAYS.

The Council, together with NextGen Highways, filed in response to the Grid Deployment Office's (US Department of Energy) implementation of Section 50152 of the Inflation Reduction Act ("IRA") regarding grants to facilitate the siting of interstate electric transmission lines ([Grants to Facilitate the Siting of Interstate Electricity Transmission Lines](#)).

This was among the first initiatives under the IRA to advance the development of specific projects and the "overall objectives, goals, and priorities" under this authority, which also include transmission financing loan funding as well as funding to cover expenses and planning for interregional and offshore transmission lines. Importantly, the Comment contends that use of existing ROWs will yield benefits to consumers and the economy by leveraging these past investments for future cost-saving, environmental protection, and economic efficiency. Under the IRA, the GDO can also fund siting authorities with a focus on grid expansion within existing ROWs ([LINK TO COMMENTS](#)).

## II. THE COUNCIL'S COMMENT TO FERC REGARDING APPLICATION FOR PERMITS TO SITE INTERSTATE ELECTRIC TRANSMISSION FACILITIES ([Applications for Permits to Site Interstate Electric Transmission Lines](#))

The Council strongly supports the Federal Energy Regulatory Commission's proposed actions to achieve the "grid of the future" by using its new authority to site transmission lines, similar to past practices for natural gas pipelines. Transmission expansion plans have frequently been frustrated by inaction, delay, or rejection by agencies historically charged with authorizing and siting such projects. The success of the Commission's modernization programs will ultimately depend on the timely development, locations, and construction of major transmission lines. Physical deployment of infrastructure and technologies that increase transfer capabilities between states, markets, and regions ensure grid reliability and resilience and help avoid delay, litigation, and economic waste. However, the Commission must recognize that it must urge project developers to utilize existing transportation ROWs, like those owned by railroads, to keep development costs and regulatory reviews to a minimum. ([LINK TO COMMENTS](#))

III. JOINT COMMENTS ON DOE's NOTICE OF INTENT AND REQUEST FOR INFORMATION ON DESIGNATION OF NATIONAL INTEREST ELECTRIC TRANSMISSION CORRIDORS ([DOE Proposes National Interest Electric Transmission Corridor Designation Process](#))

Together with NextGen Highways, The Council urges the Commission to respond proactively to the growing demand to integrate and modernize the electric grid. The Joint Commenters petition FERC to (1) more actively explore the important transmission siting opportunities afforded by existing transportation ROWs; (2) require consideration by developers of existing ROWs as conditions of approval or remedies for harmful project impacts on the environment, communities, or resources; (3) promote planning for development of high voltage direct current ("HVDC") transmission lines that link new resources, regions, and markets for power, using the ROWs of the railroad network to maximize grid integration, and minimize adverse environmental and socio-economic impacts and, as a result, reduce the time and resources spent in regulatory approval processes for major projects; and (4) create productive partnerships with new industry players like railroads and their state and federal regulators, so as to enhance communications, establish first principles, and leverage expertise across the transportation and electric power ecosystems ([LINK TO COMMENTS](#)).