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Docket ID No. 2024-10251: Notice of Availability of Preliminary List of Potential National Interest Electric Transmission Corridors

The BlueGreen Alliance (BGA) unites America's labor unions and environmental organizations to solve today's environmental challenges in ways that create and maintain quality jobs and build a stronger, fairer economy. Our partnership is firm in its belief that Americans don't have to choose between a good job and a clean environment—we can and must have both.

To achieve our collective goal of achieving net zero GHG emissions economy-wide by 2050, clean energy and transmission deployment must grow rapidly. The U.S. will have to rapidly expand its existing energy infrastructure, with many studies suggesting that we need to increase renewable energy deployment at least two to three times from current levels. The Department of Energy (DOE) National Transmission Needs Study recently found that the United States needs an additional 47,300 gigawatt-miles of power lines by 2035, a 57% expansion of the current grid.[i] In particular, our grid needs high-capacity, long-distance transmission that can transport electricity from remote parts of the country to denser, more urban areas.[ii] If implemented well, these Corridors of National Interest will help strengthen and expand transmission infrastructure necessary to reduce carbon emissions, increase clean energy, and create high-quality union jobs across the country. These types of designations will help streamline project timelines and clarify the community engagement process that is needed for rapid transmission deployment where the grid is most constrained.

Corridors Will Help Promote Clean Energy

Through streamlined permitting and additional financial assistance, several of the corridors designated by DOE will help connect clean energy projects to the national

grid and ensure they can meet the reliability and load demands where it's needed most. Currently, there are 930 gigawatts of renewable generation in the queue, waiting to be connected to the power grid.[iii] These projects can deliver clean, reliable power across the country but are delayed by lengthy transmission deployment times and an uncoordinated approach to transmission planning, siting, and permitting, in addition to a backlogged interconnection queue. Designations made under NIETC that accommodate for planned and future clean energy resources can help accelerate siting and permitting times associated with transmission construction. Corridor designations that can help accommodate these energy resources include:

- The Midwest-Plains corridor can help support the Southwest Power Pool's proposed Grain Belt Express project, which would be the highest capacity transmission line in the United States, providing 5,000 megawatts of transmission capacity and connecting multiple balancing authorities with bi-directional capacity.

- The NY-Mid-Atlantic corridor can support projects providing additional capacity for onshore transmission of offshore wind in the region, including the Empire State Connector and Clear Path New York Transmission Lines. Transmission upgrades to support the interconnection are critical to the clean energy transition, and much more will be needed beyond the 12 miles designated in the NIETC.

- The Mountain-Northwest Corridor will help support transmission projects that will alleviate congestion and allow the interconnection of renewable energy sources onto the grid, helping to meet future demand growth and strengthen the resilience of the electrical grid in Oregon and Nevada.

These corridor designations will lead to more project development certainty, largely due to additional federal funding eligibility and required robust community engagement during siting and permitting processes. Greater transmission development project certainty generates additional certainty for associated clean energy, manufacturing, and infrastructure projects downstream that cannot move forward without a guarantee of power supply and sufficient grid capacity for interconnections. Local communities in the NIETC regions will very likely see increased public and private investments into projects and new facilities. Increased transmission development certainty also helps support necessary workforce development pipelines. For labor unions, a signed workforce agreement and additional project timeline certainty allows them to onboard any potentially needed new apprentices at an appropriate time. BGA encourages the DOE to be diligent in ensuring that community engagement is substantive and that there is robust oversight, enforcement measures in place for any associated agreements (such as Community Benefit Agreements, Project Labor Agreements, etc.). Binding agreements provide certainty to communities, so they know that a transmission project in a NIETC will lead to tangible benefits, like local energy resilience projects and high-quality job opportunities for local workers.

Conclusion

Transmission is critical to deploying clean energy resources quickly, safely, and reliably across the country and to creating high-quality, union jobs. Our ability to decarbonize our economy and create equitable employment opportunities across the country depends on the ability for transmission projects to be permitted and sited in a reasonably timed process. A NIETC designation is a significant tool in jumpstarting construction and deployment of high-capacity, interstate transmission projects. We are encouraged to see the transmission capacity deployed because of these designations.

[i] Department of Energy, National Transmission Needs Study, 2023. https://www.energy.gov/gdo/national-transmission-needs-study

[ii] National Renewable Energy Laboratory, Examining Supply-Side Options to Achieve 100% Clean Electricity by 2035, 2022. : https://www.nrel.gov/docs/fy22osti/81644.pdf

[iii] Berkeley Lab, Queued Up: Characteristics of Power Plants Seeking Transmission Interconnection As of the End of 2021, 2022. https://emp.lbl.gov/sites/default/files/queued_up_2021_04-13-2022.pdf