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Submitted to AGCC@dot.gov

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Comments of the Corporate Energy Buyers Association on DOT's America's Great Corridors of Commerce (AGCC) Request for Information

I. Introduction

The Corporate Energy Buyers Association ("CEBA") respectfully submits these comments on the U.S. Department of Transportation's Request for Information regarding the America's Great Corridors of Commerce (AGCC) initiative.¹ CEBA is a business association that activates energy buyers and their partners to drive low-cost, reliable, carbon emissions-free global electricity systems. CEBA represents members with \$40 trillion in market value, including energy customers of all sizes, suppliers, and service providers.

Our companies collectively purchase large volumes of electricity to power manufacturing facilities, data centers, logistics operations, and other critical business activities throughout the United States. CEBA has a strong interest in policies that improve the affordability, reliability, and availability of electricity while supporting continued economic growth.

CEBA supports the Department's efforts to explore innovative approaches to accelerate deployment of transmission and other linear utility infrastructure by leveraging existing transportation rights-of-way. Expanding and modernizing utility infrastructure is essential to meeting rapidly growing electricity demand and maintaining U.S. competitiveness. The AGCC concept has the potential to reduce development timelines, lower costs, improve coordination among agencies, and increase access to the infrastructure needed to support economic growth.

At the same time, we encourage DOT to ensure that any AGCC designation process prioritizes open access, competition, affordability, and measurable benefits for electricity customers.

The following comments respond directly to DOT's questions.

¹ U.S. Department of Transportation, Office of the Under Secretary of Transportation for Policy. "America's Great Corridors of Commerce; Request for Information" (September 2026); See, <https://www.federalregister.gov/documents/2026/09/11/2026-18521/americas-great-corridors-of-commerce-request-for-information>

II. Support for the AGCC Concept

Corporate electricity buyers strongly support efforts to accelerate the deployment of transmission and other utility infrastructure. Across many regions of the country, electricity demand is growing rapidly due to advanced manufacturing, data centers, electrification, and other emerging technologies. However, expansion of utility infrastructure often faces lengthy siting, permitting, and right-of-way challenges that delay projects and increase costs.

Transportation corridors represent an attractive opportunity to reduce these barriers. Leveraging existing highway and rail rights-of-way can minimize the need for greenfield development, reduce land acquisition challenges, improve coordination among stakeholders, and accelerate project delivery.

CEBA particularly supports the Department's focus on the following priorities:

- Using existing transportation corridors to facilitate utility development;
- Improving Federal interagency coordination;
- Accelerating permitting and environmental review processes;
- Promoting regional and multi-state infrastructure development;
- Creating additional pathways for transmission deployment; and
- Encouraging infrastructure investments that enhance affordability, reliability, and economic growth.

If implemented successfully, AGCC could help reduce transmission constraints, improve access to energy resources, and support a more resilient and reliable electric grid.

III. Customer Benefits Should Be a Central Evaluation Criterion

The RFI appropriately emphasizes affordability and reliability. We encourage DOT to make customer benefits a primary criterion in the AGCC designation process.

Projects receiving AGCC designation should demonstrate how they are expected to provide measurable benefits to electricity customers, including the following:

- Increased transmission capacity that allows more generation resources to reach customers;
- Reduced transmission congestion that lowers delivered electricity costs;
- Faster interconnection of new generation, storage, and transmission resources;
- Improved reliability during periods of extreme weather or high demand;
- Reduced curtailment of available energy resources;
- Greater resilience through infrastructure redundancy and geographic diversification; and
- Lower overall infrastructure costs compared to greenfield alternatives.

For large commercial and industrial customers, these benefits can produce substantial economic value. Examples include the following:

- New transmission capacity can expand access to lower-cost energy resources located outside load centers, increasing the supply options available to customers and helping moderate energy costs.
- Reduced congestion can lower wholesale electricity costs and reduce congestion charges that are ultimately borne by utility customers.

- More efficient transmission development can reduce the need for costly reliability-driven upgrades and emergency investments that otherwise may be recovered through customer rates.
- Faster interconnection of generation and storage resources can expand available electricity supply, improving reliability and reducing the risk of delays that constrain economic development.
- Enhanced transfer capability among regions can improve access to a broader portfolio of energy resources, reducing price volatility and supporting reliability during extreme weather events.
- Strategic use of existing transportation rights-of-way can reduce land acquisition costs, permitting delays, and development risk, lowering the overall cost of infrastructure investments that customers ultimately fund.

Accordingly, CEBA encourages DOT to evaluate AGCC proposals using objective measures of customer value, including reductions in congestion costs, increases in transfer capability, improvements in reliability metrics, avoided infrastructure costs, and accelerated deployment timelines.

IV. Preserve Open Access and Competition

The proposed Corridor Manager model may offer important administrative and financing efficiencies. However, AGCC should be designed to promote open and non-discriminatory access to corridor infrastructure.

Corporate electricity buyers benefit from competitive electricity markets and infrastructure planning processes that allow multiple market participants to access transmission and utility infrastructure on fair terms.

Accordingly, DOT should encourage:

- Transparent leasing practices;
- Non-discriminatory access to corridor infrastructure;
- Competitive procurement approaches; and
- Appropriate safeguards against the exercise of market power by corridor operators.

These protections will help ensure that AGCC facilitates greater competition and innovation while maximizing public benefits.

V. Prioritize Projects that Address Regional Infrastructure Needs

The RFI highlights the opportunity to support data centers, manufacturing facilities, and other large loads. CEBA supports efforts to align infrastructure investment with growing electricity demand.

However, AGCC corridors should be selected based on their ability to serve broader regional needs rather than the requirements of any individual customer or industry sector.

Projects that improve regional reliability, increase transfer capability, reduce congestion, enable access to diverse energy resources, and unlock new generation development are likely to provide the greatest long-term benefits to electricity consumers and the broader economy.

VI. Accelerating Access to Power for Growing Communities and Businesses

For many large electricity consumers, the most significant constraint on economic growth is no longer the availability of generation resources but the infrastructure required to deliver those resources to load. Across many parts of the

country, businesses face delays associated with transmission constraints, interconnection backlogs, and insufficient infrastructure to support new demand.

AGCC should prioritize projects that expand transmission capability, reduce interconnection bottlenecks, and increase access to diverse sources of electricity. Corridors that demonstrably reduce customer costs, improve reliability, facilitate access to new generation resources, and enable timely access to power for growing communities and businesses should receive priority consideration.

VII. Streamline Permitting While Maintaining Durable Outcomes

CEBA supports efforts to simplify and coordinate permitting and environmental reviews, including greater use of existing tools and increased interagency coordination.

At the same time, the success of AGCC will depend not only on speed but also on certainty. Projects should be advanced through permitting pathways that are legally durable and capable of withstanding challenge. Durable outcomes reduce project risk, support investment, and ultimately accelerate delivery.

We therefore encourage DOT to focus on both efficient and durable permitting processes that provide confidence to investors, developers, utilities, and customers.

VIII. Ensure Technology-Neutral Infrastructure Planning

Corporate electricity buyers procure power from a diverse range of resources and generally benefit from policies that enable competition among technologies.

AGCC should remain technology-neutral and support infrastructure that allows the electric system to access the lowest-cost and most reliable resources available. A technology-neutral approach will maximize flexibility, strengthen reliability, and ensure that customers benefit from market competition.

IX. Technical Assistance and Federal Coordination

CEBA supports the Department's proposal to provide technical assistance and concierge services for designated corridors.

Particularly valuable forms of support could include the following:

- Interagency coordination among permitting agencies;
- Identification of best practices across jurisdictions;
- Assistance navigating Federal financing programs;
- Coordination on multi-state corridor development;
- Development of model agreements and open-access frameworks; and
- Collection and dissemination of data demonstrating customer, reliability, and economic benefits achieved by designated corridors.

These resources can help reduce uncertainty and accelerate project implementation.

X. Responses to DOT's Specific Questions

The following comments respond directly to DOT's questions.

Question 1: Critical challenges and barriers to deploying AGCC

We believe the most significant challenges are permitting certainty, stakeholder coordination, cost allocation, and ensuring that customer benefits are realized.

Siting, Planning, and Permitting

The primary challenge facing transmission and other linear infrastructure development is the time required to secure permits and approvals across multiple jurisdictions. Existing highway and rail corridors may reduce some of these challenges, but successful implementation will require close coordination among transportation agencies, utilities, environmental agencies, and landowners.

We support the proposed Federal coordination and concierge services because they may reduce administrative delays and improve consistency across agencies.

Funding and Financing

Infrastructure projects should demonstrate clear customer value. While AGCC may reduce development costs by leveraging existing rights-of-way, DOT should ensure that financing structures encourage efficient investment and avoid shifting unnecessary costs to electricity customers.

Community Engagement

Even when infrastructure is developed within existing transportation corridors, meaningful engagement with affected communities remains important. Early outreach can reduce project delays and improve acceptance.

Market Limitations

Not every corridor will support sufficient utility demand to justify investment. DOT should prioritize corridors that demonstrate clear infrastructure needs, regional electricity benefits, and strong commercial demand.

Question 2: Minimizing challenges for multi-state projects

Corporate electricity buyers strongly support the emphasis on longer, regionally significant corridors.

Many of the greatest customer benefits from transmission infrastructure arise when projects connect resources and customers across multiple states and balancing areas. Multi-state projects can:

- Increase transfer capability between regions;
- Improve reliability during extreme weather events;
- Expand access to diverse energy resources;

- Reduce transmission congestion; and
- Improve competition among electricity suppliers.

The Federal government can support these projects by:

- Establishing clear coordination mechanisms among states;
- Promoting consistent permitting approaches;
- Providing model agreements for revenue sharing and operational responsibilities; and
- Ensuring that interstate projects receive appropriate priority during Federal review.

Question 3: Challenges and opportunities associated with the P3 model

We support DOT's effort to explore innovative public-private partnership structures.

The proposed Corridor Manager model could streamline development by creating a single point of coordination for right-of-way access, utility leasing, and long-term operations.

However, DOT should ensure that AGCC corridors remain accessible on fair and non-discriminatory terms.

Specifically, the Department should encourage:

- Transparent leasing practices;
- Competitive procurement processes;
- Open-access principles where appropriate;
- Clear performance standards for corridor operators; and
- Protections against undue market concentration or discriminatory access.

These safeguards will help ensure that AGCC promotes competition and maximizes customer benefits.

Question 4: Technical assistance and support

The proposed Federal task force could provide significant value.

The most useful forms of assistance would include:

- Interagency permitting coordination;
- Assistance navigating Federal financing programs;

- Development of model agreements and best practices;
- Technical guidance for multi-state corridors;
- Identification of opportunities to colocate multiple infrastructure assets; and
- Data and analytical support to quantify customer, economic, and reliability benefits.

In particular, standardized methodologies for measuring customer benefits would improve transparency and support better project selection decisions.

Question 5: Proposed AGCC designation process

We generally support the proposed designation process.

The proposed focus on market demand, corridor readiness, stakeholder support, and financial feasibility is appropriate.

However, DOT should consider adding explicit customer-benefit criteria to the designation process.

Projects should be evaluated based on their potential to:

- Reduce delivered electricity costs;
- Increase transmission capability;
- Improve reliability and resilience;
- Reduce congestion costs;
- Accelerate access to new electric supply; and
- Support long-term economic growth.

We also encourage DOT to prioritize projects that provide broad regional benefits rather than projects designed primarily to serve individual facilities or specific industries.

Question 6: Can AGCC accelerate infrastructure deployment compared to greenfield projects?

Yes.

Corporate buyers believe AGCC has the potential to accelerate deployment relative to many greenfield projects by reducing right-of-way acquisition challenges, utilizing existing infrastructure corridors, and improving agency coordination.

AGCC may also help reduce development costs by:

- Limiting the need for new land acquisition;
- Reducing permitting complexity;
- Creating opportunities for shared infrastructure development; and
- Leveraging economies of scale through colocation.

The potential benefits of AGCC are consistent with findings from the Federal Energy Regulatory Commission's ("FERC") report to Congress on opportunities for high voltage transmission, including over the nation's transportation corridors.² FERC found that high-voltage transmission can improve reliability and resilience by increasing the ability to share resources across regions, enhancing system restoration following disruptive events, improving frequency response, and strengthening overall grid stability. The report also found that transmission investments can reduce congestion, improve competition among electricity suppliers, increase access to lower-cost energy resources, and reduce curtailment of available generation. These benefits ultimately accrue to electricity customers through improved reliability, greater access to competitively priced electricity, and a more resilient electric system. FERC further identified co-location of transmission within existing transportation corridors as a significant opportunity to reduce development costs, minimize impacts associated with establishing new rights-of-way, and streamline infrastructure deployment. As a result, transportation corridor development represents an important opportunity to deliver customer benefits while accelerating construction of critical utility infrastructure.

From an economic development perspective, faster infrastructure deployment can help communities and businesses gain access to electricity more quickly, supporting manufacturing growth, data center investment, and broader economic activity. New transmission capacity can expand access to lower-cost electricity resources, reduce congestion costs that increase customer bills, and improve the ability of regions to import power during periods of high demand or system stress. FERC's analysis notes that transmission investments improve reliability, reduce congestion, and enhance competition among electricity suppliers, all of which benefit electricity consumers.

However, AGCC should complement rather than replace other transmission development pathways. Transportation corridors represent an important additional option, but they should not become the exclusive focus of infrastructure planning. DOT should continue to prioritize projects that demonstrate clear customer benefits, including reduced congestion, increased transfer capability, improved reliability, and access to lower-cost electricity resources. These outcomes should be considered alongside any economic development benefits associated with corridor designation.

Question 7: Design elements needed to ensure affordability and customer benefits

Affordability should remain a core objective of the AGCC initiative.

We recommend incorporating the following design elements:

Customer Benefit Metrics

DOT should evaluate whether AGCC projects deliver measurable customer benefits, including:

² Federal Energy Regulatory Commission. "Report on Barriers and Opportunities for High Voltage Transmission. (June 2020). See, https://cleanenergygrid.org/wp-content/uploads/2020/08/Report-to-Congress-on-High-Voltage-Transmission_17June2020-002.pdf

- Reduced congestion costs;
- Increased transfer capability;
- Reduced curtailment of generation resources;
- Improved reliability metrics; and
- Reduced infrastructure development costs.

Open Access and Competition

Infrastructure developed through AGCC should support competitive access and avoid creating unnecessary barriers to market participation.

Regional Planning

Projects should be aligned with demonstrated regional reliability and infrastructure needs rather than solely with individual economic development opportunities.

Technology Neutrality

AGCC should remain technology-neutral and support infrastructure that enables access to the lowest-cost and most reliable resources available to customers.

Cost Discipline

DOT should encourage project structures that demonstrate efficient use of capital and clear value to utility customers and ratepayers.

Examples of Customer Benefits

For large commercial and industrial customers, successful AGCC projects could:

- Expand access to lower-cost electricity resources located outside major load centers;
- Reduce transmission congestion costs that increase electricity bills;
- Accelerate interconnection of generation, storage, and transmission projects;
- Improve reliability during periods of rapid demand growth and extreme weather;
- Increase regional transfer capability and reduce price volatility; and
- Lower overall infrastructure costs by reducing land acquisition expenses and duplicative development.

These outcomes can help maintain affordable, reliable electricity while supporting continued economic growth.

XI. Conclusion

Corporate electricity buyers support the goals of the AGCC initiative and believe the program has significant potential to accelerate deployment of the utility infrastructure needed to support economic growth, grid reliability, and rising electricity demand.

The greatest measure of success for AGCC will be whether it delivers tangible benefits to electricity consumers. Projects that reduce congestion costs, expand access to generation resources, improve reliability, accelerate infrastructure deployment, lower investment costs, and support long-term affordability should receive the highest priority.

To maximize the benefits of the initiative, DOT should ensure that AGCC projects prioritize customer benefits, preserve open access and competition, support regional infrastructure needs, maintain technology neutrality, and deliver durable permitting outcomes. With these principles incorporated into program design, AGCC can become an important tool for expanding critical infrastructure while helping maintain affordable, reliable electricity for American consumers and businesses.

Thank you for the opportunity to provide comments. We look forward to continued engagement as the Department refines the AGCC framework.

Sincerely,

/s/

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