

September 7, 2026

Via Electronic Submission to NeedsStudy.Comments@hq.doe.gov

Comments of the Corporate Energy Buyers Association on DOE's Draft 2026 National Transmission Needs Study

I. Introduction

The Corporate Energy Buyers Association ("CEBA") respectfully submits these comments on the Department of Energy's ("DOE") Draft 2026 National Transmission Needs Study ("Draft Needs Study")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.

CEBA appreciates DOE's continued efforts to evaluate transmission needs across the nation and provide stakeholders with a comprehensive assessment of challenges facing the electric system. The Needs Study represents an important contribution to understanding the infrastructure needed to maintain affordable, reliable, and resilient electricity service as demand grows and the generation mix evolves.

Accelerating electricity demand growth reinforces the need for proactive transmission planning. Grid Strategies' 2025 Transmission Planning and Development Report Card² ("2025 Report Card") found that projected nationwide five-year summer peak-load growth rose from about 24 GW in 2022 to roughly 150 GW in 2025, driven largely by data centers and advanced manufacturing. The report concludes that this growth is compressing planning timelines and increasing the need for forward-looking processes that anticipate future transmission needs.

As a business association representing large commercial, industrial, and institutional electricity customers, CEBA believes robust regional and interregional transmission is essential to maintaining affordable electricity, strengthening resource adequacy, expanding customer access to generation resources, and supporting long-term economic competitiveness. For large electricity customers, transmission is increasingly an affordability, reliability, and economic competitiveness issue. Insufficient transmission development can increase congestion costs, limit access to lower-cost generation resources, delay customer access to electricity service, and create resource adequacy challenges that affect

¹ U.S. Department of Energy, Office of Electricity. "Draft National Transmission Needs Study" (July 2026); See, <https://www.energy.gov/documents/national-transmission-needs-study-draft-july-2026>

² GridStrategies on behalf of the Americans for a Clean Energy Grid (ACEG). "2025 Transmission Planning and Development Report Card: Assessing Progress and Shortfalls as Demand Accelerates Nationwide" (February 2026); See, https://gridstrategiesllc.com/wp-content/uploads/ACEG_2025-Transmission-Planning-and-Development-Report-Card.pdf

business operations and investment decisions. As electricity demand grows, transmission infrastructure must keep pace with customer needs to maintain affordable and reliable electricity service.

Many of the recommendations below build on positions CEBA previously presented to DOE, including most recently in its November 21, 2025, comments submitted in response to DOE's Speed to Power Request for Information³. CEBA continues to believe that transmission is one of the most important tools available to improve affordability, reliability, resource adequacy, and economic competitiveness for electricity customers.

The comments below recommend that DOE strengthen future Needs Studies by quantifying transmission needs, evaluating recent transmission development against customer-focused outcomes, emphasizing transmission's resource adequacy value, expanding analysis of advanced transmission technologies, centering large-load growth in planning assumptions, improving transparency, and connecting identified needs to implementation pathways.

II. DOE Should Better Quantify Future Transmission Needs

To make the Needs Study more actionable, DOE should begin by pairing its qualitative findings with quantitative benchmarks.

CEBA supports the Draft Needs Study's conclusion that significant transmission expansion will be needed to address growing electricity demand, reliability concerns, resource adequacy needs, and congestion. The study defines transmission needs as existing or expected transmission capacity constraints or congestion and explains that transmission investments can improve reliability and resilience, alleviate congestion, reduce transfer limitations between neighboring regions, deliver lower-cost generation, and support future electricity demand and reliability requirements. However, while the Draft Needs Study clearly identifies the categories of transmission need facing the nation, it generally does not quantify the scale of transmission expansion needed to address them. Future Needs Studies should pair qualitative assessments with quantitative estimates of transmission expansion and transfer-capability requirements so policymakers, planners, and customers can evaluate whether current development trajectories are sufficient to meet future reliability, affordability, and economic-development needs.

For electricity customers, quantitative estimates provide a benchmark for evaluating whether current transmission development is keeping pace with the reliability, affordability, and economic development needs identified in the Draft Needs Study.

At a minimum, DOE should incorporate findings from existing federal and reliability assessments that estimate future transmission requirements. Specifically, the final Needs Study would benefit from discussing results from the DOE's most recent National Transmission Planning Study⁴ and NERC's Interregional Transfer Capability Study.⁵ Together, these analyses provide valuable information regarding transmission expansion needed to accommodate both load growth and resource adequacy objectives.

³ U.S. Department of Energy, Grid Deployment Office. "Accelerating Speed to Power/Winning the Artificial Intelligence Race: Federal Action to Rapidly Expand Grid Capacity and Enable Electricity Demand Growth" (Fall 2025); See, https://www.energy.gov/sites/default/files/2025-09/55587_Speed_to_Power_FINAL.pdf

⁴ U.S. Department of Energy, Grid Deployment Office. "National Transmission Planning Study" (October 2024); See, <https://www.energy.gov/oe/national-transmission-planning-study-0>.

⁵ North American Electric Reliability Corporation (NERC). "Interregional Transfer Capability Study (ITCS): Strengthening Reliability Through the Energy Transformation Final Report" (November 2024); See, https://www.nerc.com/globalassets/initiatives/itcs/itcs_final_report.pdf

The Draft Needs Study also recognizes that transmission investments can alleviate power-transfer limitations between neighboring regions and notes that interregional transmission is increasingly important for reliability, resilience, and accommodating load growth. However, the report does not estimate the amount of additional transfer capability needed to address those identified limitations. Incorporating results from NERC's Interregional Transfer Capability Study would help bridge this gap by providing a quantitative benchmark against which policymakers, planners, and electricity customers can evaluate whether transmission development is keeping pace with identified reliability and resource adequacy needs.

CEBA previously highlighted NERC's Interregional Transfer Capability Study in comments submitted to DOE's Speed to Power initiative and encouraged DOE to incorporate quantitative assessments of transfer capability needs into federal transmission planning efforts. NERC identified a minimum of 35 GW of additional interregional transfer capability that would immediately improve reliability across multiple regions. The National Transmission Needs Study presents an opportunity to incorporate this analysis and provide stakeholders with a clearer understanding of the magnitude of transmission expansion necessary to support reliability and economic growth.

Recent analysis further demonstrates the value of establishing quantitative benchmarks for future transmission needs. Grid Strategies' 2025 Report Card evaluates regional transmission development relative to DOE's 2023 National Transmission Needs Study and concludes that many regions remain below estimated transmission requirements. The report further notes that rapidly increasing load forecasts may mean that existing estimates of transmission need are already conservative. Incorporating similar benchmarking analysis into future Needs Studies would provide stakeholders with a clearer understanding of whether transmission development is keeping pace with future reliability and economic needs.

A recent Congressional Budget Office overview⁶ provides an additional benchmark. CBO found that U.S. transmission capacity grew by an average of only 0.6 percent annually from 2017 through 2024, while DOE's National Transmission Planning Study estimated that transmission capacity may need to reach 2.1 to 2.6 times its 2020 level by 2050, equivalent to average annual growth of approximately 2.5 to 3.2 percent. This gap reinforces the need for DOE to quantify future transmission requirements and regularly evaluate whether actual development is keeping pace with projected electricity demand.

The need for updated quantitative benchmarks is particularly important given DOE's observation that long-term transmission planning assumptions are rapidly changing. The Draft Needs Study notes that projected demand growth from large loads and data centers is evolving quickly and that existing national modeling studies may not fully reflect current market conditions. Future Needs Studies should therefore evaluate multiple load-growth scenarios and quantify how higher-demand futures affect transmission expansion requirements, transfer capability needs, and resource adequacy outcomes. This limitation is particularly important because the consequences of underestimating future demand can be significant. If transmission planning assumptions understate future load growth, transmission needs may likewise be understated, resulting in congestion, delayed infrastructure deployment, resource-adequacy challenges, and higher customer costs. Quantifying transmission requirements across multiple load-growth scenarios would help stakeholders understand how sensitive future transmission needs are to evolving demand forecasts and better evaluate the risks associated with planning assumptions that prove too conservative.

⁶ Congressional Budget Office, "Overview of Electric Transmission" (CBO Publication 62705; August 2026), slides 7 and 11. See, <https://www.cbo.gov/publication/62705>. CBO found that U.S. transmission capacity grew by an average of 0.6 percent annually from 2017 through 2024 and cited DOE's estimate that transmission capacity may need to reach 2.1 to 2.6 times its 2020 level by 2050, equivalent to average annual growth of 2.5 to 3.2 percent.

DOE should establish a consistent framework for quantifying national transmission needs and regularly report metrics related to transfer capability expansion, interregional connectivity, and progress toward addressing identified transmission constraints. Providing this information would improve transparency and give stakeholders a clearer understanding of the gap between identified needs and current development trends.

III. Recent Analysis Demonstrates the Growing Need for Proactive Regional and Interregional Transmission Planning

Quantifying need is only the first step; regional and interregional planning must then translate those needs into forward-looking transmission portfolios. Recent analysis reinforces the need for transmission planning that looks beyond incremental upgrades and anticipates regional and interregional needs before constraints emerge. Grid Strategies' 2025 Report Card concludes that many regions continue to fall short of best practices despite recent progress toward long-term planning reforms. For large electricity customers, proactive planning is critical because transmission constraints can delay access to electricity service, increase exposure to congestion costs, and limit the availability of lower-cost generation resources.

Recent analysis by S&P Global Energy⁷ further demonstrates the customer value of proactive regional and interregional transmission planning. Its August 2026 study, *Powering Growth and Affordability: The Role of Transmission in Economic and National Security*, evaluated selected transmission expansions across base- and high-demand scenarios. The study found positive net benefits in every scenario and concluded that the scenario allowing both regional and interregional expansion produced substantially greater net benefits than the scenario limited to lower-capacity intraregional additions. These results reinforce the importance of planning beyond incremental local upgrades and evaluating transmission portfolios based on their ability to reduce system costs, expand access to lower-cost generation, support load growth, and improve reliability.

The Report Card recommends proactive 20-year planning horizons, scenario-based planning, multi-value benefit assessment, and better integration of transmission planning with generator interconnection and resource planning. Future Needs Studies should use these planning practices to explain how regions can move from identifying transmission needs to developing portfolios that address them.

DOE can further strengthen future Needs Studies by assessing whether regional planning processes are adopting these practices and identifying where gaps remain. For example, DOE could compare regional planning practices against best-practice criteria such as scenario planning, multi-value benefit assessment, interregional coordination, and transparent tracking of whether identified needs are addressed.

IV. The Needs Study Should More Carefully Characterize Recent Transmission Investment Trends

To assess whether planning is keeping pace with need, DOE should distinguish between transmission activity and transmission outcomes.

CEBA appreciates the Draft Needs Study's discussion of transmission investment and development between 2016 and 2024. The Draft Needs Study finds that approximately 85,000 circuit-miles of transmission facilities rated above 69 kV were newly constructed, upgraded, or rebuilt during that period and concludes that substantial transmission

⁷ S&P Global Energy, "Powering Growth and Affordability: The Role of Transmission in Economic and National Security" (August 2026). See, <https://www.nationalgrid.com/national-grid-ventures/powering-growth>

investment has occurred across many regions. CEBA agrees that investments have been made. However, the relevant policy question is not only how much transmission infrastructure was constructed, but whether those investments addressed the transmission needs identified elsewhere in the study. Without comparing transmission development outcomes against identified needs, it is difficult to determine whether recent investments are closing, maintaining, or widening the gap between current infrastructure capabilities and future system requirements.

For example, the Draft Needs Study reports that approximately 66 percent of transmission facilities installed between 2016 and 2024 were 69 kV or 138 kV facilities, while transmission lines rated at 500 kV or above accounted for only four percent of installations nationwide. The final report should assess whether that voltage profile aligns with the regional and interregional transfer-capability needs identified elsewhere in the study. This distinction matters because lower-voltage additions may provide meaningful local reliability and distribution benefits while contributing less to regional transfer capability or interregional power transfers. Because the Draft Needs Study identifies interregional transfer limitations, congestion, and resource-sharing needs as important transmission challenges, the final report should evaluate whether the voltage profile and geographic distribution of recent transmission development align with those needs. Available transmission development data suggest that this alignment may be lacking and warrants further evaluation in the final report.

Recent transmission construction data evaluated by Wood Mackenzie⁸ further underscores the importance of evaluating whether current development aligns with identified transmission needs. Publicly available FERC transmission infrastructure data indicate that high-voltage transmission development has slowed considerably compared to the prior decade, with annual additions of transmission facilities above 230 kV declining substantially from levels observed during the major buildout period that culminated with Texas's Competitive Renewable Energy Zones projects. This trend raises important questions about whether recent transmission development is sufficient to support the regional transfer capability, interregional coordination, and large-load growth needs identified elsewhere in the Draft Needs Study. The final report should therefore evaluate not only the quantity of transmission infrastructure constructed, but also whether recent development is expanding the high-voltage backbone necessary to address the transmission challenges identified throughout the study.

Similarly, the pace of interregional transmission development remains extremely limited despite broad recognition of its reliability and economic benefits. The Draft Needs Study notes that only a small amount of interregional transmission has been added in recent years, even as it concludes that long-term regional and interregional investments will be needed to support load growth, improve resource adequacy, and reduce congestion. Given the scale of transfer capability needs identified by planners and reliability organizations, the final study should evaluate whether recent transmission development materially expanded transfer capability, improved resource sharing among regions, or reduced the constraints identified throughout the report.

Electricity customers benefit most from transmission investments that reduce congestion, expand transfer capability, improve reliability, and provide access to lower-cost generation resources. The final Needs Study should therefore evaluate recent transmission development based on measurable customer outcomes, not solely on dollars invested or miles constructed.

DOE should evaluate the consequences of insufficient transmission development, including higher congestion costs, reduced electricity affordability, reliability risks, resource adequacy challenges, interconnection delays, and constrained

⁸ Wood Mackenzie. "Opinion: Why US power transmission needs reinventing" (July 2026). See, <https://www.woodmac.com/news/opinion/why-us-power-transmission-needs-reinventing/> and specifically the report extract 'Wired for failure: the US transmission gap' made publicly available for download.

access to generation resources. Understanding these costs of inaction is essential to evaluating the urgency and potential value of future transmission investments.

V. The Needs Study Should Place Greater Emphasis on the Resource Adequacy Value of Transmission

One of the most important outcomes DOE should evaluate is transmission's contribution to resource adequacy.

CEBA strongly supports DOE's recognition that transmission plays a critical role in maintaining electric reliability. However, the Draft Needs Study could more fully evaluate transmission's contributions to resource adequacy and resilience. Transmission enables regions to share capacity resources, reduce reserve requirements, and access available generation during periods of system stress. These benefits can improve reliability while lowering overall system costs. The recent S&P Global Energy analysis discussed earlier similarly found that transmission expansion can reduce the need for more expensive local generation, improve access to remote resources, and support reserve sharing, providing additional evidence of transmission's resource adequacy and system-cost benefits. During extreme weather events, transmission often allows grid operators to move electricity between regions in ways that provide reliability benefits beyond traditional firm-capacity arrangements. These operational realities demonstrate that transmission delivers substantial resource adequacy value that may not always be fully reflected in conventional planning frameworks.

The final Needs Study should incorporate additional evidence regarding transmission's contribution to resource adequacy, including effective load carrying capability analyses, interregional transfer studies, capacity-sharing benefits, reserve-margin reductions, and operational experience during extreme weather events. Such analysis would help stakeholders better understand transmission's role alongside generation, storage, and demand-side resources in maintaining grid reliability.

CEBA has previously encouraged DOE to recognize the reliability benefits of increased interregional transfer capability, including the ability of transmission to support reliability during periods of system stress. The final Needs Study should evaluate transmission as a resource adequacy resource in addition to its economic benefits.

For commercial and industrial customers, resource adequacy is directly tied to business continuity, operational resilience, and long-term electricity affordability. Accordingly, the final Needs Study should place greater emphasis on transmission as a reliability resource. For these customers, the ability to access reliable power during tight system conditions can influence facility siting, expansion timelines, and confidence in long-term investment decisions.

VI. The Needs Study Should Expand Its Assessment of Advanced Transmission Technologies

In addition to evaluating transmission's reliability value, DOE should consider how emerging technologies can help meet near-term needs.

CEBA appreciates DOE's acknowledgment of advanced transmission technologies but believes the final Needs Study should provide substantially greater detail regarding their potential contribution to meeting near-term transmission needs. CEBA has previously encouraged DOE to pursue a dual-track strategy that combines long-term greenfield transmission expansion with near-term deployment of advanced transmission technologies within existing transmission rights-of-way. Advanced conductors, dynamic line ratings, advanced power flow controls, topology optimization tools, and related grid-enhancing technologies can increase transfer capability and reduce congestion while larger, greenfield transmission projects proceed through planning and permitting processes. S&P Global Energy's

recent transmission analysis likewise concluded that advanced transmission technologies could increase usable transfer capability, deepen production-cost savings, reduce the need for local generation investment, and complement conventional transmission expansion.

DOE should recognize that meeting future transmission needs will require multiple transmission expansion pathways. For example, ClearPath and Evolved Energy Research's recent "Amping Up the Grid: The Role of High Ampacity Conductors in Transmission Expansion" study ("ClearPath's study")⁹ found that a cost-optimal transmission expansion strategy requires both reconductoring of existing facilities and construction of new greenfield transmission corridors. A reconductoring-only strategy was unable to maintain reliability under high-demand conditions, while a greenfield-only strategy produced higher costs and significantly greater land-use requirements. The study further suggests that relying exclusively on either new greenfield transmission construction or upgrades to existing facilities may result in inefficient investment outcomes. A combination of strategic greenfield transmission development and upgrades to existing facilities may provide the most cost-effective path to expanding transfer capability while minimizing costs and land-use impacts.

ClearPath's study found that, under high demand growth scenarios, approximately 75 percent of transmission capacity additions through 2030 were achieved through reconductoring existing transmission corridors using higher-ampacity conductors. The analysis also found that reconductoring reduced transmission investment by approximately \$20 billion and avoided more than 6,500 miles of greenfield transmission development compared to a greenfield-only expansion strategy.

These findings suggest that advanced transmission technologies can help address near-term transmission constraints and accommodate large-load growth while broader greenfield transmission expansion is planned, permitted, and constructed. At the same time, the analysis found that greenfield transmission remains essential to maintaining reliability and creating new transmission pathways. Together, these findings support CEBA's recommendation for a dual-track approach that combines accelerated deployment of advanced transmission technologies with continued investment in greenfield regional and interregional transmission infrastructure.

To be clear, CEBA does not view advanced transmission technologies as substitutes for major greenfield regional or interregional transmission expansion. However, they can serve an important complementary role and may offer cost-effective opportunities to improve reliability and affordability in the near term. Future Needs Studies should distinguish between faster near-term solutions that can increase capacity within existing rights-of-way and longer-term investments that require large-scale regional and interregional transmission expansion. Both pathways will be necessary to address rapidly growing electricity demand.

DOE should develop a more robust assessment of advanced transmission technologies, including their potential impacts on transfer capability, congestion reduction, reliability, and electricity affordability. Such analysis would help planners and policymakers better understand how these technologies can complement traditional transmission expansion strategies.

VII. Load Growth Should Remain Central to Future Transmission Planning

Those near-term tools will be especially important as large-load growth accelerates and planning assumptions change.

⁹ ClearPath and Evolved Energy Research. "Amping Up the Grid" (August 2026); See, <https://clearpath.org/wp-content/uploads/sites/44/2026/08/Amping-Up-the-Grid-Report-8-10-2026.pdf>

CEBA commends DOE for identifying rapid load growth as one of the primary drivers of future transmission needs. Future Needs Studies should focus on how planning processes can incorporate emerging demand from data centers, advanced manufacturing facilities, electrification, and other large loads before under-forecasting creates reliability, affordability, or interconnection challenges.

For example, BloombergNEF recently published a new U.S. data center capacity forecast¹⁰. Installed U.S. data center capacity is now projected to reach 118 gigawatts (GW) by 2030, a 52% increase from its December 2025 forecast. BloombergNEF also expects 194GW of data center capacity to be online in the U.S. by 2035, an 83% upward revision. Several factors contributed to the higher forecast, the most significant being continued growth in the announced U.S. data center pipeline. Since December 2025, the pipeline has expanded by an additional 101GW, increasing the amount of capacity likely to come online by 2030.

For large electricity customers, the central risk is that transmission plans may lag behind real-world demand growth. Under-forecasting demand can increase congestion costs, delay customer access to electricity supply, reduce reliability margins, and increase overall electricity costs.

DOE should establish a formal process for engaging large electricity customers and incorporating commercial and industrial demand projections into future Needs Studies. Regularly updating those assumptions would improve planning accuracy and strengthen future assessments of transmission needs.

VIII. DOE Should Improve Transmission Transparency and Accountability

Improved load-growth assumptions should be paired with better transparency about whether transmission development is keeping pace.

Large electricity customers depend upon high-quality information regarding transmission constraints, congestion, transfer capability, project costs, and development timelines when making long-term investment decisions. However, transmission data remains fragmented and inconsistent across many regions. CEBA has previously encouraged DOE to improve transparency regarding transmission and congestion information, noting that greater visibility helps customers evaluate infrastructure needs and supports more informed planning decisions.

Fragmented data can make it harder for customers to compare regional conditions, assess project risks, and evaluate whether transmission constraints could affect future operations.

Future National Transmission Needs Studies should include consistent metrics related to transfer capability expansion, congestion trends, project completion rates, advanced transmission technology deployment, and customer affordability outcomes. Such information would improve accountability and allow stakeholders to better evaluate whether transmission investments are delivering the benefits identified in the Draft Needs Study.

Following the Grid Strategies' Report Card example, DOE should also consider establishing a recurring transmission progress scorecard tracking key indicators such as interregional transfer capability additions, congestion trends, advanced transmission technology deployment, and progress toward addressing transmission constraints identified in federal and reliability studies. This would provide stakeholders with a more meaningful measure of whether transmission development is keeping pace with national needs.

¹⁰ BloombergNEF. "Six Things to Know About BNEF's New US Data Center Capacity Outlook" (July 29, 2026; See, <https://about.bnef.com/insights/data-centers/six-things-to-know-about-bnefs-new-us-data-center-capacity-outlook/>)

IX. The Needs Study Should Better Connect Identified Needs to Implementation Pathways

Greater transparency should ultimately help stakeholders identify not only where needs exist, but how to address them.

CEBA appreciates DOE's efforts to identify transmission challenges facing the nation. However, the Draft Needs Study would be stronger if it more clearly explained how stakeholders should respond to the needs it identifies, including growing electricity demand, congestion, transfer-capability limitations, and resource-adequacy concerns. For example, the final Needs study should explain how identified needs inform regional and interregional transmission planning, transmission siting and permitting priorities, advanced transmission technology deployment, federal financing initiatives, and customer engagement processes. Explicitly connecting identified needs to implementation pathways would increase the report's value as a planning and policy tool.

DOE need not prescribe specific projects to make the study more actionable; it can instead identify key decision points, responsible actors, and policy tools that could help move identified needs toward implementation.

Future Needs Studies should identify specific actions available to Congress, states, regional planners, utilities, customers, and federal agencies to address transmission constraints and improve customer outcomes. The report should explain how its findings can inform regional transmission planning, interregional transmission development, and implementation of federal transmission policies.

Future Needs Studies should also examine opportunities to better align transmission planning and generator interconnection processes. As CEBA previously noted in comments to DOE, more coordinated planning can improve the timing of transmission investments, reduce interconnection bottlenecks, improve cost-allocation outcomes, and expand customer access to generation resources.

DOE should support the development of next-generation transmission planning tools capable of evaluating greenfield transmission, reconductoring, advanced conductors, grid-enhancing technologies, and other transmission solutions within a single planning framework. Recent research indicates that many existing planning tools cannot fully evaluate the tradeoffs among transmission technologies while simultaneously accounting for reliability requirements. Improved analytical capabilities would help planners identify lower-cost opportunities to expand transfer capability and improve customer outcomes.

DOE should continue using the Needs Study as a foundational analytical tool to identify areas where transmission constraints create significant reliability, affordability, resource adequacy, or economic development challenges. Clearer connections between identified needs and available implementation pathways would increase the practical value of future studies and help ensure that planning activities ultimately result in transmission development.

X. Conclusion

Together, these recommendations would make future Needs Studies more actionable for policymakers, planners, and electricity customers.

CEBA applauds DOE's central finding that substantially more transmission infrastructure will be required to maintain affordability, reliability, resource adequacy, and resilience as electricity demand grows. The final Needs Study should strengthen that foundation by quantifying transmission needs, measuring customer outcomes, and connecting identified needs to implementation pathways.

To strengthen the final Needs Study, CEBA recommends that DOE:

- Incorporate quantitative estimates of future transmission expansion and interregional transfer capability needs, including NERC's finding that approximately 35 GW of additional interregional transfer capability would improve reliability across multiple regions;
- Establish metrics that measure transmission outcomes, including transfer capability, reliability benefits, and congestion reduction;
- Distinguish between transmission spending and investments that materially expand regional and interregional transfer capability;
- Evaluate the costs associated with insufficient transmission development;
- Expand analysis of transmission's contribution to resource adequacy and reliability;
- Develop a more robust assessment of advanced transmission technologies;
- Establish a formal process for incorporating large customer demand projections into future transmission assessments;
- Improve transmission transparency and establish customer-oriented metrics that track progress toward identified needs;
- Support development of next-generation transmission planning tools capable of evaluating the full range of transmission solutions; and
- More clearly connect identified transmission needs to implementation pathways and federal transmission policy objectives.

Consistent with previous comments submitted by CEBA to DOE regarding transmission planning, grid modernization, advanced transmission technologies, interregional transfer capability, and growing electricity demand, CEBA continues to believe that transmission investments should be evaluated based on customer outcomes. For large electricity customers, the objective is not transmission investment for its own sake, but affordable electricity, reliable service, strong resource adequacy, timely access to power, and the infrastructure necessary to support continued economic growth. The National Transmission Needs Study should help policymakers measure progress toward those outcomes and identify the actions necessary to achieve them.

Sincerely,

/s/

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