

**UNITED STATES DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY**

**COMMENTS OF WIRES ON THE REQUEST FOR COMMENTS
REGARDING CONGESTION STUDIES AND DESIGNATIONS
UNDER SECTION 216 OF THE FEDERAL POWER ACT**

WIRES, a non-profit coalition of electric transmission providers, transmission customers, technology providers, and regional grid organizations¹ which is formed to promote investment in electric transmission, respectfully submits these comments in response to the request by Office of Electricity Delivery and Energy Reliability (“OEDER”) of the Department of Energy (“DOE”) for comments on the proposed delegation to the Federal Energy Regulatory Commission (“FERC”) of the Secretary's authority to designate National Interest Electric Transmission Corridors under section 216 (a)(1) of the Federal Power Act (“FPA”).²

I.

COMMUNICATIONS

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¹ Given WIRES diversity and the informal nature of the DOE enquiry, not all WIRES members have expressed support for the positions herein.

² Section 1221 of the Energy Policy Act of 2005

II.

COMMENTS OF WIRES

WIRES was formed in 2006 to encourage the needed expansion and upgrade of the nation's high voltage electric transmission system.³ It encourages creative and realistic approaches to designating National Interest Electric Transmission Corridors ("NIETC"), to the maximum extent permitted by current law. The benefits to be derived from a stronger high-voltage interstate electric transmission system include greater reliability, stronger bulk power markets, access to diverse and often location-constrained energy resources, and advancement of national policies favoring competition, economic development, and major improvement in the nation's employment picture.⁴

WIRES supports the proposed delegation. In the most practical terms, implementation of the NIETC designation process has been stymied by the courts and the sheer breadth of the approaches adopted by the Department. It is inconceivable that the Congress adopted the "backstop" transmission siting process in the 2005 Act in anticipation that it would never be used to advance the objective of rationalizing the regulation of transmission siting process when necessary. The law is careful not to infringe on the ability of States to responsibly site transmission facilities and the proposed delegation would not change that basic scheme.

We believe that combining the NIETC designation and backstop siting processes in one agency will be efficient and that it will complement the FERC's recent initiative to

³ See www.wiresgroup.com

⁴ WIRES' recent study identifies and quantifies many of the foreseeable economic benefits: "Employment and Economic Benefits of Transmission Infrastructure Investment in the U.S. and Canada" (May 2011), at www.wiresgroup.com

promote coordinated intra- and inter-regional transmission planning. WIRES recommends that the Secretary move forward with this important administrative action.

Respectfully submitted,



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