

May 28, 2024

The Honorable Julie Fedorchak
North Dakota Public Service Commission
President, National Association of Regulatory Utility Commissioners
1101 Vermont Avenue NW, Suite 200
Washington, DC 20005

RE: FERC Order 1920

Dear Commissioner Fedorchak:

Greetings to you and congratulations on your important work as President of the National Association of Regulatory Utility Commissioners (“NARUC”). As a former chair of the NARUC Consumer Affairs Committee and the NARUC Y2K Ad-Hoc Task Force, and further as former member of the NARUC Board of Directors and Committee on Electricity, as the former President of the Southeastern Association of Regulatory Utility Commissioners (“SEARUC”), and of course, former member and past Chair of the Florida Public Service Commission, I am writing to express my support of FERC Order 1920 because of the positive impact it can have on Florida and the rest of the Southeast.

The current state of regional transmission planning in the Southeast does not encourage electric utilities to pursue connections within the region or to other regions when those connections would produce customer savings and increase reliability. At a time where all areas of the country are faced with rising costs, shifting generation resources, erosions of the reliability of traditional generating fleets, and increased extreme weather, I am sure that you recognize that it is of the utmost importance that state Commissions, and FERC focus on avenues to reduce costs and improve reliability. Strategic transmission projects, at the regional level, where the benefits are obvious, will be key at this time.

I applaud where state Commissions in our region have directed electric utilities to use transmission planning as a tool to increase reliability and reduce costs in the face of a transitioning electric generation fleet. One such example is Duke Energy’s two electric utilities that operate in North and South Carolina. The Carolinas Transmission Planning Collaborative is embarking on a transmission planning process that reflects many of the provisions in FERC’s Order 1920. While that is a local transmission planning process that covers only Duke’s service territory, it’s likely success can be a sign of what a similar process can do for the rest of the Southeast.

As with most parts of the country, resource planning practices vary by state across the Southeast. With the exception of the North Carolina Utilities Commission (NCUC) in its 2022 Carbon Plan Order, Commissions in the Southeast have been largely silent on the potential for strategic and proactive transmission projects to supplement planned generation in Integrated Resource Plans (IRPs) or similar resource planning practices. FERC Order 1920 also includes a role for state Commissions to shape the regional transmission planning process, in particular by weighing in on cost allocation, transmission drivers, and solution evaluation process.

Again, FERC Order 1920 presents an opportunity for Commissions to take a closer look at the potential for regional transmission projects to lower costs and improve reliability for customers in their states. The Order, and the revised transmission planning process we expect to come after it, adds another tool to the utility's resource planning toolbox. I write because I am optimistic for the positive impact FERC Order 1920 and its implementation can have on electric utility customers across the Southeast as we face increasingly uncertain times.

Thank you for considering my views on this matter. I tentatively plan to attend NARUC's conference in West Palm Beach, and I would love an opportunity to visit.

Sincerely,

/s/ Ennis Leon Jacobs Jr.

Ennis Leon Jacobs, Jr.

President, Board of Directors of the Southern Alliance for Clean Energy