



As we move towards the integration of more renewable resources, a planned approach is also essential for grid reliability and resiliency, providing grid operators with multiple paths for offshore wind energy to reach load.

And while the benefits of planned transmission are significant, and better understood than ever before, there are non-technical barriers to the development of planned transmission. These vary from RTO to RTO, but in short, the fundamental issue is that tariffs have developed so that the expansion of the grid using a transmission-first approach was simply never contemplated. As we see in California, MISO, ERCOT, Europe, and now NYISO, this is not a technical issue. But current tariffs allow bundled radial transmission to be studied at their injection capability and move ahead with certainty of upgrades associated with a queue position, while planned transmission – outside of Order No. 1000 – may not; with no studies and associated rights on which significant investments can be made.

States may choose to use Order No. 1000, but they also may choose to continue to directly procure transmission as they are doing today (which we heard earlier is the preference in New England).

And let's not talk ourselves into insurmountable challenges. While larger regional planning may be desirable, planned transmission-first is not all or nothing. One or a group of states may choose to procure and realize the benefits of transmission-first systems today. And let me be clear: there are not a long list of issues must be addressed for planned transmission to be utilized by states today: cost allocation or payment mechanisms are not the issue. Technical standards are not a barrier. States have, and continue to, pay for transmission for offshore wind today. And states could procure unbundled, open access transmission-first projects today.

However, simple changes, as we recently saw approved for NYISO, are needed to remove barriers by ensuring that RTO tariffs provide currently absent provisions for unbundled, transmission-first expansion. For that reason, a notice of proposed rulemaking to correct these barriers as a targeted, near term fix is *something FERC can do immediately* that will not cause delay. Rather it will help unleash private enterprise solutions: advanced development work – as seen in Anbaric's 2018 and 2019 BOEM applications for transmission ROW, and other advanced work that will help the states meet their goals more rapidly.

Thank you for the invitation and opportunity to participate today, and I look forward to your questions.

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