

Stakeholder Comment on CETA Principles of Community Engagement

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To gain trust and acceptance, communities should be informed about alternatives to proposed transmission projects, how they were evaluated, and why they were rejected.

If CETA wishes to build a credible stakeholder and community engagement process that is characterized by an open and transparent exchange of information about projects and their impacts, then CETA should openly and honestly convey to communities that potential alternatives to proposed traditional transmission projects exist and were fully investigated, and explain why the proposed project was found to be the best way forward in this instance.

Communities should not be expected to somehow know what the alternatives are, as transmission alternatives are specialized information that is not commonly understood. Furthermore, disclosure that alternatives were investigated and were rejected for stated reasons builds community trust that CETA is not simply collaborating with for-profit entities to "sell the community" on a profitable new-build or rebuild traditional transmission project.

Communities should be informed that there are at least two ways to increase transmission capacity besides building traditional transmission lines, where the latter is the superior choice in only some instances, and should be considered the last resort due to its high cost and greater impact on communities and the environment. The other two approaches that can sometimes address some transmission needs are:

1. **Advanced Transmission Technologies (ATT)**. ATT may be able to increase the capacity of existing lines in existing rights-of-way much cheaper, faster, and less impactfully than new-build transmission or uprated transmission rebuilds that use traditional ACSR or ACSS. Reconductoring with advanced carbon-core conductor (such as TS or ACCC) can double the capacity of existing lines, save money on all-in capital costs due to the ability to reuse existing structures, and provide enormous operational savings for ratepayers due to reduced line losses. Other ATT that have notable potential to increase capacity, either by themselves or in combination with each other or with transmission-connected energy storage, include: Dynamic Line Ratings (DLR), Advanced Power Flow Control, (APFC), and topology optimization, collectively known as Grid-Enhancing Technologies (GETs).

2. **Distribution-level and Non-Wires Alternatives (NWA)**. In some circumstances, demand-side measures might be able to reduce peak capacity demand on a transmission line enough to postpone or eliminate the need for a transmission capacity upgrade, for example by deploying transmission-connected energy storage, virtual power plants (VPPs) and other demand response measures, and/or local distribution-connected generation resources.

The risk for CETA and transmission developers in not seriously investigating these transmission alternatives, or in not disclosing early on that these alternatives exist and explaining why they

were not selected, relates to perceived conflicts of interest and insider manipulation. The above transmission alternatives are much less profitable for utilities and traditional transmission developers, hence these entities are incentivized and pre-disposed to only investigate or select more profitable traditional projects. Therefore, there is a strong need for upfront transparency and serious consideration of ATT and NWA alternatives lest increasingly-aware community members or other stakeholders or advocates raise this issue and end up derailing what may be perceived as the selection of a self-serving approach over a less costly, faster, less disruptive alternative that is better for the community, ratepayers, and the environment.

That said, sometimes only new transmission can address certain transmission needs, such as providing access to new resource areas, or enhancing interregional energy trading, where the above options may not work as well. However, even in such circumstances, it is quite possible that deploying carbon-core conductor and/or other ATT or energy storage on a new-build line would still enhance the performance and/or economics of the project.

It is important to state this transparency policy in CETA's community engagement guidelines because it will force the question of alternatives to be investigated early, before a project is settled upon, knowing that the question of alternatives may have to be addressed down the line when communities are engaged and permits are applied for. It may seem shady to communities that the question of alternatives was either not considered by project proposers or that knowledge of alternatives was withheld from communities.

The topics of ATT and NWA are increasingly being brought up in PUC proceedings, transmission planning meetings, at the FERC, and even by multiple stakeholders in the CETA transmission study, so communities will be increasingly aware of transmission alternatives and increasingly demand their consideration early in the planning process, or developers risk the perception that a new-build transmission project may be unnecessary or overly costly or impactful.

Thank you very much for considering these comments!

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