

September 4, 2026

The Honorable Catherine Jereza
Assistant Secretary, Office of Electricity
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Subject: Comments on the U.S. Department of Energy 2026 National Transmission Needs Study

Dear Assistant Secretary Jereza:

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit comments on the U.S. Department of Energy (DOE) 2026 National Transmission Needs Study pursuant to section 216(a)(1) of the *Federal Power Act*. NASEO represents the governor-designated State and Territory Energy Offices from each of the 56 states, territories, and the District of Columbia. State Energy Offices lead a range of energy policies and programs across all energy sectors, including, in most cases, leading or supporting actions on state transmission and distribution system planning.

Few energy issues are of greater concern to the states than the reliability, affordability, security, and sustainability of the electric system. The nation's electric transmission system supports national economic competitiveness and enables economic growth in every state. Through the information and data provided in this DOE study, State Energy Offices have an enhanced analytical foundation to help to inform their work on regional and interregional transmission development.

NASEO Supports the Study's Findings, Especially in Such Key Areas as the Following:

- ***Additional Transmission Infrastructure is Needed Due to Load Growth.*** Load growth, an aging electric grid, physical and cyber security concerns, and extreme weather events, are all priority policy topics for State Energy Offices. Improved transmission planning and more rapid development of priority transmission infrastructure are central to addressing these grid challenges and unlocking economic growth. Evidence of the State Energy Offices' commitment to accelerated transmission development can be found in the growing number of governor executive orders and state legislation that is informed by State Energy Offices.
- ***Interregional Transmission has Multifold Benefits for Consumers.*** NASEO and many of our State Energy Office members have been leading the call for improved planning and action on interregional transmission development to improve reliability and manage grid modernization costs. Given the high level of risk associated with longer-term load forecasting, many states are advancing "least-

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regret” infrastructure options that support multiple grid benefits and minimize risks. For capacity and reliability, interregional transmission enables neighboring regions to share reserve margins across seasons, security events, and weather patterns. Interregional transmission is also increasingly recognized as an option to hedge the risk of overbuilding electric infrastructure in ways that would exacerbate affordability concerns.

NASEO Recommends Consideration of the Following Enhancements to the Study:

- ***Analyze Advanced Transmission Technologies’ Impact on Transmission Development Prioritization.*** NASEO recommends providing additional analysis to assess how implementation of grid-enhancing technologies on existing lines would impact the near- and long-term identified need for new transmission. Through the NASEO Grid Optimization Task Force, states and the private sector are examining advanced transmission technology options in the context of both meeting existing demand and in determining cost-effective transmission development. Assessing the practical potential of these technologies to address the congestion needs identified in the study would help states refine and prioritize transmission development.
- ***Integrate Additional Regional and State-led Transmission Studies.*** NASEO recommends consideration of integrating additional, existing state-level and regional transmission studies into the DOE study, or as an addendum that further informs state and private sector action and investment.
- ***Incorporate Data from Integrated Resource Plans.*** The study acknowledges that in some regions outside of organized markets, such as in the Southeast and West, limited data was available to include in this important DOE study. NASEO recommends examining existing Integrated Resource Plans in these regions to help refine or fill data gaps.
- ***Support Improved Load Forecasting to Inform Transmission Development.*** NASEO recommends State Energy Office and federal collaboration on improving the accuracy of load forecasting, including the use of innovative AI tools and economic development data, to better inform transmission development policies and investment decisions.
- ***Evolution of the Transmission Needs Study.*** NASEO suggests building on the excellent work of this study by advancing continuous transmission needs analyses to reflect rapidly evolving markets and technologies, thereby creating a “living study” for ongoing use by DOE, states, and key stakeholders.

NASEO and the State Energy Offices appreciate the strong leadership of DOE’s Office of Electricity and the proactive outreach to State Energy Offices on this study’s findings. We look forward to continuing our collaboration aimed at efforts to stabilize, optimize, and grow the grid and strengthen the electric system.

Best regards,



David Terry
President, NASEO