



C3 SOLUTIONS

September 2, 2026

**Conservative Coalition for Climate Solutions' Response to the Department of Energy's
Draft 2026 National Transmission Needs Study**

Docket Details and Number:

Notice of Availability and Request for Comment on Draft 2026 National Transmission Needs
Study: [Docket No. DOE-HQ-2026-0892-0001](#)

DOE Contact for Submission:

Alissa Baker, Program Manager

Name and Email Address for the Principal Point of Contact:

Dylan Maxik – Policy Analyst
dylan@c3solutions.org

Institution or Organization Affiliation, Postal Address, and Email Address:

Conservative Coalition for Climate Solutions (C3 Solutions)
316 Pennsylvania Ave SE,
Suite 403
Washington, DC 20003
info@c3solutions.org



C3 SOLUTIONS

As rising demand is pushing the limits of the U.S. power grid, C3 Solutions commends the Department of Energy (DOE) for [publishing](#) the draft 2026 National Transmission Needs Study, a congressionally commissioned report diagnosing the current and future needs of our high-voltage transmission network. Upgrading and expanding the transmission system in a way that emphasizes reliability and cost discipline is a nationwide priority that cannot be understated. American households, businesses, and industrial growth will all be impacted by the efficiency, effectiveness, and innovative embrace of today's buildout. The DOE's draft study captures the breadth of this challenge and specifically highlights the cost benefits of increased system-wide connectivity through transmission infrastructure that bridges distinct regions and interconnections. With that in mind, C3 Solutions offers the following recommendations to strengthen the final study and align it more closely with consumer-first transmission policy [principles](#).

To further strengthen the report's findings, we urge the DOE to:

- Expand the discussion of **advanced transmission technologies (ATTs)**, including how these tools can improve utilization of existing infrastructure and rights-of-way.
- Assess the unique **permitting, planning, and siting obstacles** to new transmission and generation facilities, with attention to their impacts on cost and schedule overruns.
- Include a discussion of **alternative solicitation and procurement models** to develop grid infrastructure, such as competitive bidding, merchant builds, and consumer-regulated electricity.

Long-distance transmission facilities which enable power to be transferred across disparate regions of the U.S. are essential to stabilizing electricity prices during high-demand events. Greater interregional grid connectivity can put downward pressure on consumers' utility bills. The report language robustly supports this conclusion, showing the cost-reducing impacts of expanded transmission capacity, particularly for long-distance infrastructure compared to smaller facilities. A more well-connected bulk power grid can not only temper rates but also improve resource adequacy and system resilience—criteria that may decline in some areas as headroom on the transmission network shrinks.

Beyond the importance of connectivity, the companies developing transmission infrastructure play a crucial role in cost and schedule discipline. The report spotlights a key development trend here: 98 percent of all transmission circuit-miles built between 2016 and 2024 were developed by monopoly utilities and transmission owners. These entities' outsized role in transmission construction is noteworthy and especially marks the inadequate use of alternative development and procurement models that encourage greater competition.



C3 SOLUTIONS

Advanced Transmission Technologies: Spurring innovation on the existing system

Advanced transmission technologies, or ATTs, are a category of grid upgrade solutions that enable more effective utilization of our existing poles and wires. For instance, replacing old conductors with ones that can carry more electrical current, known as [reconductoring](#), can significantly reduce system congestion, allowing the lowest-cost resources to deliver electricity most of the time. Apart from ATTs' technical merits as complements to new facilities, these conductors are often significantly cheaper and faster to deploy than new, redundant, conventional lines. ATTs, however, do not obviate the need for new lines altogether.

The report could more explicitly discuss their widespread benefits and competitive edge in today's infrastructure buildout. It could also delineate the regulatory barriers to deploying these tools, which fall under both federal and state jurisdiction (i.e., utility planning). This assessment could incorporate recent direction from the Federal Energy Regulatory Commission (FERC) on ATTs for [regional transmission planning](#) and [large-load interconnection](#). The applicability of this technology set across different planning categories underpins its relevance in serving future transmission needs.

Permitting, Planning, and Siting: Addressing the pre-construction trifecta

A complex mix of federal statutes and implementing regulations has contributed to a [permitting environment](#) that is difficult to navigate for long-distance transmission. Bureaucratic slow-walking and uncapped litigation timelines are prohibitive to improving our electricity grid. These barriers [raise](#) development costs and [delay](#) the service that transmission upgrades and new lines are meant to deliver.

Yet, before permitting challenges, planning and siting transmission lines also frequently imperil new development. Several coordination [gaps](#), including misaligned interregional planning horizons, inconsistent evaluation criteria, and complex cost allocation negotiations, impede projects that could otherwise mitigate significant constraints on the system. These are administrative barriers that merit attention from grid operators, states, and utilities. Altogether, the planning and siting environment should give developers credible means to propose beneficial lines, with the expectation that their proposals will be fairly evaluated. Where states fail to assess transmission proposals promptly, a last-resort federal backstop should provide developers with greater upfront certainty. This backstop must ensure sound cost allocation, robust cost-benefit analysis against [alternatives](#), and good-faith efforts by developers to secure voluntary easements from landowners.

The final report could strengthen its analysis of these artificial barriers that require attention from relevant jurisdictional stakeholders. By educating decision-makers on permitting, planning, and siting, the report can clarify where projects frequently stall, what benefits more efficiently built transmission can deliver, and how these lower costs trickle down to households' utility bills.



C3 SOLUTIONS

Who Builds Transmission and Why it Matters

Construction trends in transmission facilities to date reflect a clear bias towards incumbent development. Weak planning [oversight](#) leads utilities to undertake local distribution-level development overwhelmingly, often without a [cost-benefit analysis](#) or solicited bids. Similarly, merchant projects, financed and built without guaranteed cost recovery, are often [excluded](#) from mandatory planning or deemed ineligible for compensation to provide crucial grid services. These diverse planning and procurement approaches affect who bears risk, how projects are selected, and how costs are controlled. In fact, recent historical research [shows](#) competitive procurement has contributed to increased cost and schedule discipline across most FERC-regulated regions. Research also shows states with laws enacted that suppress transmission competition have [higher](#) electricity prices than states without such laws.

Sophisticated electricity customers should also have a straightforward pathway for procuring electricity that is not connected to the main power grid. One development option of this type, called [consumer-regulated electricity](#), aims to remove barriers that large facilities encounter in purchasing grid-isolated generation, transmission, and distribution assets from another company. Today, vendors of that power service often must jump through hoops to register as a utility with a state's regulatory commission, even when the service these companies provide has no direct impact on current consumers' rates.

The study should more carefully assess how barriers to non-incumbent transmission development impact the cost, schedule, and deployment speed of this infrastructure nationwide. Injecting competition into America's near-term transmission buildout is critical as retail electric rates rise. Non-utility developers also have greater incentives to undertake long-distance projects that often provide broader benefits than incumbent-preferred, locally-scoped infrastructure.

Next Steps

C3 Solutions lauds DOE leadership, and specifically the Office of Electricity, for progressing this study and providing critical, comparative insights into the need for new transmission infrastructure and upgrades across the country. The final National Transmission Needs Study can make its strongest contribution by explaining barriers and opportunities to ensure the next era of transmission is authentically [consumer-first](#). The study begins to move in this direction but would benefit from (1) an expanded discussion of *advanced transmission technologies*, (2) a clearer treatment of *permitting, planning, and siting obstacles*, and (3) an explicit examination of *non-incumbent development models*. Together, these revisions would help guide a grid buildout that delivers abundant, affordable power to American households and businesses by mapping the barriers that stand between identified transmission needs and executed projects.