



December 14, 2023

The Honorable Willie L. Phillips  
Chairman  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: Docket No. RM21-17-000

Dear Chairman Phillips,

In your capacity as Chairman of the Federal Energy Regulatory Commission (Commission), we write to urge you to finalize the agency's pending transmission planning and cost allocation rule (NOPR) as soon as practicable.

Breakthrough Energy is a network of entities and initiatives founded by Bill Gates, including investment funds, nonprofit and philanthropic programs, and policy efforts linked by a common commitment to scale the technologies – including high-voltage transmission – needed to achieve a path to net zero emissions by 2050. Our network is encouraging the development of new net-zero energy technologies, championing policies that speed innovation from lab to market, and bringing together governments, research institutions, private companies, and investors to expand and enhance clean-energy investment.

As the Commission proposes in the NOPR, there is a need to reform the existing regional transmission planning and cost allocation processes to ensure that transmission providers identify the most efficient and cost-effective facilities to meet changing resource mix and demand. Breakthrough Energy supports the Commission's NOPR objectives and urges the Commission to develop transmission planning reforms that will unlock the geographical diversity of resources in the U.S. to meet clean energy goals, increase reliability, and make energy costs affordable.

The Commission's proposed Long-Term Regional Transmission Planning requirements are crucial to the future of the electric system to ensure that regional transmission planning appropriately identifies transmission needs driven by future resource mix and electricity demand. The NOPR's proposed Long Term Scenarios should be based on a minimum 20-year planning horizon and be reassessed every three years. As the Commission has proposed, transmission needs should be identified by developing multiple long-term scenarios that utilize "best available data" and incorporate Commission-identified factors expected to drive transmission needs. Critically, the final rule must establish a minimum set of benefits that are incorporated in the transmission planning and cost allocation process and use multi-value planning to comprehensively identify investments that address all categories of needs and benefits.

Efficient planning for the grid of the future must also include utilizing the latest advanced transmission technologies. The final rule should require that transmission providers incorporate



these technologies in their transmission planning and selection analysis, such as reconductoring with Advanced Conductors, including superconducting transmission lines, and incorporating them in new transmission construction. Advanced Conductors are innovative technologies that can increase transmission capacity, reduce grid congestion, and integrate more clean generation into the grid, while simultaneously enabling better use of existing rights-of-way.

A robust rule containing these elements will help our nation unlock a future powered by affordable and abundant clean energy. We stand ready to work with you and your team to help finalize these historic transmission and cost allocation reforms.

Sincerely,

A handwritten signature in black ink that reads "Mike Boots". The signature is written in a cursive, slightly slanted style.

Mike Boots  
Executive Vice President  
Breakthrough Energy