

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Interregional Transfer Capability Study: Strengthening Reliability Through the Energy Transformation Docket No. AD25-4-000

NOTICE OF REQUEST FOR COMMENTS

(November 25, 2024)

On November 19, 2024, the North American Electric Reliability Corporation (NERC) submitted to the Federal Energy Regulatory Commission (Commission) an Interregional Transfer Capability Study (ITC Study) pursuant to section 322 of the Fiscal Responsibility Act of 2023 (Fiscal Responsibility Act).¹ All interested persons are invited to file comments on this ITC Study no later than 60 days after the date of publication in the Federal Register. We request the public to submit comments in the format indicated below.

In June 2023, Congress passed the Fiscal Responsibility Act, which requires the Commission-approved Electric Reliability Organization (i.e., NERC),² in consultation with each regional entity and each transmitting utility³ that has facilities interconnected

¹ Fiscal Responsibility Act of 2023, Pub. L. No. 118-5, 137 Stat 10, sec. 322 (2023).

² Federal Power Act (FPA) section 215 provides that the Commission may certify an Electric Reliability Organization, the purpose of which is to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval. 16 U.S.C. § 824o(c). The Commission subsequently certified NERC as the Electric Reliability Organization. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

³ Transmitting utility is defined in 16 U.S.C. § 796 as “an entity (including an entity described in section 824(f) of [title 16]) that owns, operates, or controls facilities used for the transmission of electric energy —(A) in interstate commerce; (B) for the sale of electric energy at wholesale.”

with a transmitting utility in a neighboring transmission planning region, to conduct a study of total transfer capability⁴ between transmission planning regions. The Fiscal Responsibility Act requires the ITC Study to include:

- (1) Current total transfer capability between each pair of neighboring transmission planning regions.
- (2) A recommendation of prudent additions to total transfer capability between each pair of neighboring transmission planning regions that would demonstrably strengthen reliability within and among such neighboring transmission planning regions.
- (3) Recommendations to meet and maintain total transfer capability together with such recommended prudent additions to total transfer capability between each pair of neighboring transmission planning regions.

The Fiscal Responsibility Act requires NERC to submit the ITC Study to the Commission no later than 18 months after the date of enactment of the Act (i.e., by December 2, 2024). After the ITC Study is submitted to the Commission, the Commission must publish the study for public comment and, no later than 12 months after the end of the public comment period, submit a report on its conclusions to Congress and include recommendations, if any, for statutory changes.⁵

Comments may be filed electronically via the Internet.⁶ Instructions are available on the Commission's website <http://www.ferc.gov/docs-filing/efiling.asp>. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, (202) 502-8659. Although the Commission strongly encourages electronic filing, documents may also be paper-filed. To paper-file, submissions sent via the U.S. Postal Service must be addressed to: Federal Energy Regulatory Commission, Office of the Secretary, 888 First Street NE, Washington, DC 20426. Submissions sent via any other carrier must be addressed to: Federal Energy Regulatory Commission, Office of the Secretary, 12225 Wilkins Avenue, Rockville, Maryland 20852.

⁴ 18 C.F.R. § 37.6(b)(1)(vi) (2024).

⁵ Fiscal Responsibility Act of 2023, Pub. L. No. 118-5, 137 Stat 10, sec. 322 (2023).

⁶ See 18 C.F.R. § 385.2001(a)(1)(iii) (2024).

For more information about this Notice, please contact Jessica L. Cockrell at jessica.cockrell@ferc.gov or 202-502-8190. For legal information, please contact Gonzalo E. Rodriguez at gonzalo.rodriguez@ferc.gov or 202-502-8568.

Debbie-Anne A. Reese,
Secretary.

Requested Format for ITC Study Comments

We request that commenters use the following format, based on the correlated headings in the ITC Study submittal, to indicate which aspects of the submittal are being addressed in a comment. Commenters need not address all headings outlined below.

Appendix A: Interregional Transfer Capability Study 2024

- A. **Chapter 1: The Reliability Value of Transfer Capability**
- B. **Chapter 2: Overview of ITC Study Scope and Terminology**
 - 1. **ITC Study Scope**
 - 2. **Stakeholder Participation**
 - 3. **General Comments on the ITC Study Scope and Terminology**
- C. **Transfer Capability Analysis (Part 1)**
 - 1. **Chapter 3: Transfer Capability (Part 1) Study Process**
 - 2. **Chapter 4: Transfer Capability (Part 1) Study Results**
 - 3. **Other Comments on the Transfer Capability Analysis (Part 1)**
- D. **Recommendations for Prudent Additions to Transfer Capability (Part 2) and Recommendations to Meet and Maintain Transfer Capability (Part 3)**
 - 1. **Chapter 5: Prudent Additions (Part 2) Inputs**
 - 2. **Chapter 6: Prudent Additions (Part 2) Process, Including Energy Margin Analysis Results**
 - 3. **Chapter 7: Prudent Additions (Part 2) Recommendations**
 - 4. **Chapter 8: Prudent Additions (Part 2) Sensitivity Analysis**
 - 5. **Chapter 9: Prudent Additions (Part 2) Transmission Planning Region-Specific Results**
 - 6. **Chapter 10: Meeting and Maintaining Transfer Capability (Part 3)**
 - 7. **Other Comments on Prudent Additions (Part 2)**
 - 8. **Other Comments on Meeting and Maintaining Transfer Capability (Part 3)**
- E. **Future Work**

F. ITC Study Appendices (A – J)

G. Additional Comments Outside the Specific Report Sections