

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Electric Transmission Incentives Policy
Under Section 219 of the Federal Power Act**

Docket No. RM20-10-000

**COMMENTS OF THE PUBLIC UTILITIES COMMISSION OF OHIO'S
OFFICE OF THE FEDERAL ENERGY ADVOCATE**

The Federal Energy Regulatory Commission (FERC or the Commission) seeks comment on a Notice of Proposed Rulemaking (NOPR) issued March 20, 2020 to update its electric transmission incentive policies including incentive Return on Equity (ROE) to properly encourage investment in transmission infrastructure.¹ The Public Utilities Commission of Ohio's (PUCO's) Office of the Federal Energy Advocate (Ohio FEA) was created by the Ohio Legislature in 2008 to "monitor the activities of the Federal Energy Regulatory Commission and other federal agencies and to advocate on behalf of the interests of retail electric service consumers."² The Ohio FEA is to "examine the value of the participation of this state's electric utilities in regional transmission organizations,"³ and offers its perspectives here.

¹ *Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act*, 170 FERC ¶ 61,204, (March 20, 2020) ("NOPR").

² Ohio Revised Code (ORC), Chapter 4828.24

³ *Id.*

The Ohio FEA urges the Commission to improve and reform its transmission incentive policies and ROEs to ensure that transmission owners are not overcompensated and that their actions are properly aligned with the public interest and to prevent the costs of overinvestment from being passed on to Ohio ratepayers. Comments in this proceeding are due July 1, 2020. The Ohio FEA respectfully submits the following comments.

I. SUMMARY

In its March 20, 2020 Notice of Proposed Rulemaking (NOPR), the Commission proposes to revise its electric transmission incentives regulations and policy pursuant to Section 1241 of the Energy Policy Act of 2005, codified as Section 219 of the Federal Power Act which directed the Commission to use transmission incentives to ensure reliability and reduce congestion. In this NOPR, FERC proposes a variety of changes to its transmission incentives, including removal of the nexus test from its regulations in favor of a cost-benefit analysis in which an applicant must demonstrate that a project meets or exceeds an economic-benefits threshold or reliability benefits level to be eligible for ROE incentives. The Commission also proposes a 250-basis-point cap on incentives, reasoning that the current limit on ROE incentives may be inadequate to attract new transmission investment. The Ohio FEA respectfully disagrees. Traditionally, because of regulation, the risk of transmission investment is low in most cases. Thus, incentive ROEs should be rarely granted to specific transmission projects and only sufficient to attract capital but not set so high as to result in unjust and unreasonable rates paid by FERC-jurisdictional transmission service customers.

The Commission also proposes to eliminate both Transco incentives. The Ohio FEA agrees that the current automatic ROE Transco incentive may no longer be needed. The Commission proposes to retain the incentive for ISO/RTO membership, without our support. Public utilities should not receive incentives for involuntary behaviors that they are already required by law to perform. The Commission also proposes reforms to the FERC Form-730 reporting process that would step up a grantee's requirement to demonstrate project cost-effectiveness and benefits, and a case-by-case evaluation instead of automatic granting. Both proposals have merit, we find.

II. BACKGROUND

Almost exactly one year earlier, on March 21, 2019, the Commission issued two Notices of Inquiry (NOI) on FERC's electric transmission incentives regulations and policy. The NOIs noted that the same financial model has been used since the 1980s to determine transmission ROEs and that its transmission incentive policies were 13 years old. In 2006, the package of incentives designed to induce investment and promote membership in a Regional Transmission Organization (RTO) was implemented in Order No. 679. The Commission noted in its NOI last year that conditions have changed in the intervening years. The grid no longer suffers from a lack of transmission development, congestion no longer inflates the cost of power, and most generators have long been RTO members. Market fundamentals including generation-resource shifts and the advent of storage and distributed energy resources are among the realities today that could be addressed in an update of federal transmission incentive policy.

On June 26, 2019, the Ohio FEA submitted comments in support of the Commission's endeavor to reexamine its transmission incentive policy. We advocated that FERC be concerned that capital is now being spent on transmission without a demonstration of requisite benefit. Improving and modernizing the Commission's transmission incentive policy is necessary to ensure that transmission owner actions are aligned with the public interest and to prevent overinvestment in transmission facilities.

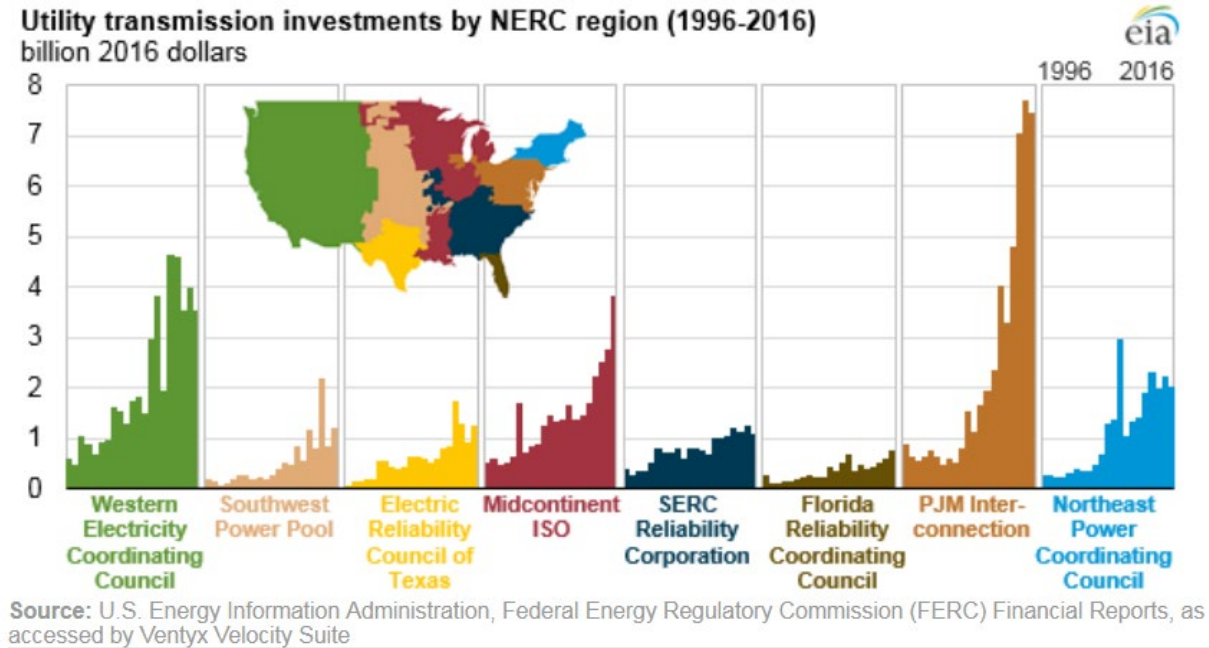
The Ohio FEA also pointed out that the Commission took steps first to encourage and later to require transmission companies by late 2001 to participate in third-party RTOs. Meanwhile, Ohio moved to retail competition in 2001, and required transmission companies to join RTOs by 2004 for transmission planning and to provide capital spending oversight independent of utilities' interests in their distribution and generation enterprises. Other states did as well.⁴ Ohio electric utilities began joining ISO/RTOs as long ago as 1997 when Cinergy, a precursor of Duke Energy Corp., joined MISO. All of Ohio's utilities had joined an ISO/RTO by 2004 and some were members of more than one ISO/RTO; however, today, all of Ohio's Transmission Owners are members of PJM.

As noted in our previous NOI comments, transmission investment has skyrocketed, for reasons including population shifts, closing of coal-fired plants, emergence of renewable energy resources, changes in the planning criteria and compliance standards, and advanced technologies. Annual transmission investment by investor-owned utilities in Reliability First Corporation, comprised of PJM and parts of

⁴ Comments of the Public Utilities Commission of Ohio's Office of the Federal Energy Advocate, June 26, 2019, p.2

MISO, doubled between 2006 and 2012, according to the U.S. Energy Information Administration. It continues on an upward trajectory.⁵ The graph below demonstrates the increase in utility transmission investments in recent years.

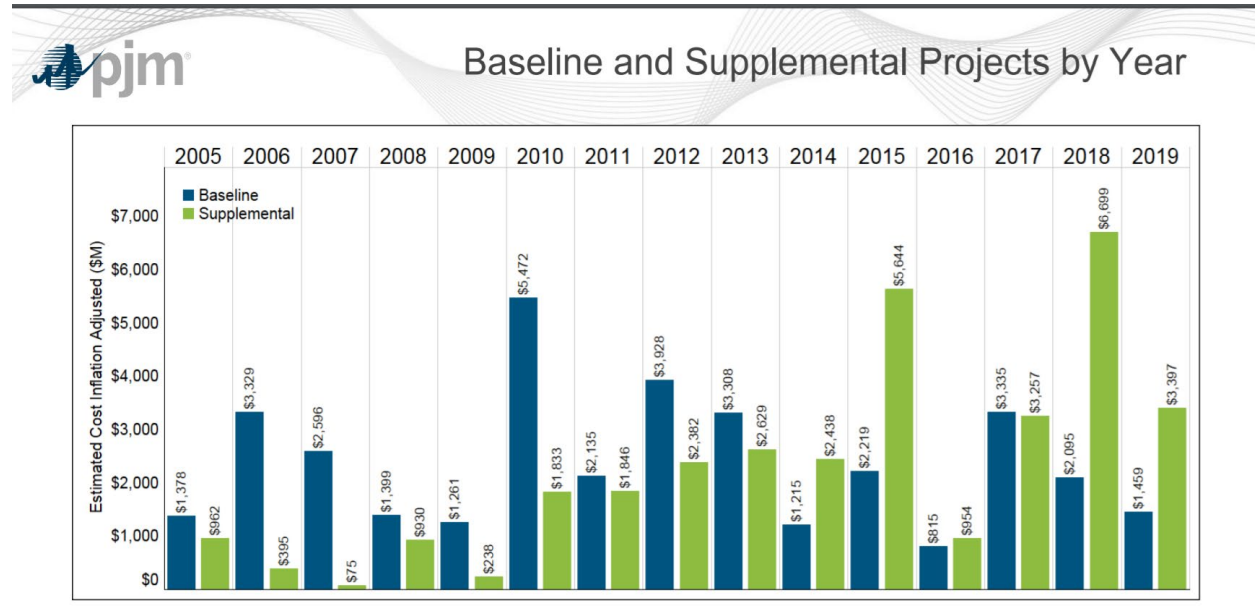
Figure 1.



Concerns about underinvestment 14 years ago have been replaced by those of overinvestment today, particularly for supplemental transmission projects. In Ohio, \$4 million in incremental transmission investments was approved in PJM in 2006. By 2018, the value of such projects ballooned to \$2.055 billion and \$1.52 billion for 2019. PJM's latest information on baseline and supplemental projects throughout the RTO is below.

⁵ Comments of the Public Utilities Commission of Ohio's Office of the Federal Energy Advocate, June 26, 2019, p. 3

Figure 2. Graph sourced from PJM, May 12, 2020 Transmission Expansion Advisory Committee. Estimated Cost in Millions.



III. COMMENTS

A. Shift from Risks and Challenges to Benefits

The NOPR proposes to no longer evaluate incentive requests based on their risks and challenges and instead has proposed to move to a framework that grants incentives based on the “benefits to consumers.”⁶

The Ohio FEA notes its concurrence and support of the Organization of PJM States (OPSI) comments reminding FERC of its requirement under FPA Section 219 to find a consumer benefit in order to approve transmission incentives. The Ohio FEA believes, as stated by OPSI, that a consumer benefits approach should be *in addition to*

⁶ NOPR at P 4, 34.

the risk/challenge’s framework or “nexus” test that currently exists under FERC Order 679 to determine the transmission projects that are truly deserving of an incentive.⁷

Accordingly, the Ohio FEA believes that, risk should continue to be considered in the granting of an incentive along with benefits of the project. But the incentive should be limited to risks that are not otherwise recovered by the base ROE calculation. The base ROE should account for risk sufficient to attract capital to that utility. An incentive ROE or non-ROE incentive, therefore, should be targeted and exceptional to account for risks not already recognized and recovered by the base ROE. As explained by OPSI, “the projects that pass both tests- having high benefit/cost ratios *and* facing risks-challenges – should be considered for incentives.”⁸ This approach is fair to both the transmission utility and the retail electricity customer paying for the additional transmission incentive.

In addition to a risk/challenges and benefits approach, the Ohio FEA finds merit in targeting incentives to transmission projects with certain characteristics that are limited to areas of *greatest* need for transmission investment. The Ohio FEA believes that transmission incentives should not be granted automatically but, rather, evaluated on a project-by-project basis. It would be helpful for FERC to establish applicable principles and criteria that require the applicant to demonstrate that the project characteristic(s) are targeted, or address areas of greatest transmission need and that the risk and challenges and the benefits of the project are unique. The applicant should prove that absence of the incentive would jeopardize the project and the problem would not otherwise be mitigated

⁷ OPSI NOPR Comments at 7.

⁸ *Id.*, at 9.

or the project should not be granted the incentive in favor of those that are targeted or address areas of greatest transmission need.

The purported cost/benefit approach also ignores the history behind the Commission's directive that unbundled transmission service be available on a comparable and nondiscriminatory basis and the reasons for the creation of independent non-profit entities to be repositories of operational control over transmission functionality. Both of these measures are rooted in the Commission's determination that the vertically integrated structure of the electric sector was anticompetitive thereby inhibiting innovation, imposing excessive costs on customers (wholesale and retail) and producing unjust and unreasonable outcomes. From this determination, the Commission identified and guided the implementation of reforms to remedy the identified problems. Among other things, the Commission backstopped the requirement that state action in favor of retail competition would need to fairly address generation-related "stranded costs" thereby supporting retail restructuring's inclusion of billions of dollars in stranded cost allowances which reduced the benefits otherwise available to consumers from a competitive market. Now the Commission seems to be moving in a direction that ignores the fact that unbundled, comparable and non-discriminatory access to transmission and fully functional RTOs were and are part of the Commission's efforts to remedy public interest abuses and the degree to which customers have already been deprived of benefits the Commission has long attributed to effective competition. More specifically, the Commission now appears to be moving to allocate a larger portion of the consumer

dividend available from a competitive market to transmission owners as though transmission owners have somehow earned it.

B. Reliability Benefits Above and Beyond NERC Standards

The Commission has also proposed a separate ROE incentive of up to 50 basis points for transmission projects that provide significant and demonstrable reliability benefits above and beyond the reliability standards of the North American Electric Reliability Corporation (“NERC”).⁹ The Commission concedes that “the NERC reliability standards provide for an adequate level of reliability.” And further acknowledges that full cost recovery is guaranteed under the FPA for transmission projects that comply with these standards. Nevertheless, FERC states that “a changing electric grid presents reliability challenges that merit increased capital investment in transmission facilities.”¹⁰

The Ohio FEA recommends that FERC should not offer incentives for projects that enhance transmission reliability above and beyond what is required by the NERC reliability standards or other established planning criteria. This could result in unnecessary overinvestment in the transmission grid. If states wish to pursue policies that achieve this goal, they can do so; it should not be a matter of federal policy or result in cost allocation to those states that will not benefit. Likewise, the Ohio FEA urges FERC to not approve incentives for projects on the basis of enhanced economic efficiency or to

⁹ NOPR at P 63-73.

¹⁰ NOPR at P 64.

relieve chronic/long-term congestion in an RTO/ISO region. PJM already administers a robust Market Efficiency process for projects that may not be needed for reliability but produce net benefits through reduced congestion and load costs. The Ohio FEA submits that it may be more beneficial to address RTO/ISO design flaws rather than to grant transmission incentives for these projects.

As FERC is aware, an area rife with projects that exceed NERC criteria is the PJM supplemental project category (see Figure 1). The Ohio FEA renews its request for FERC to directly address the question of PJM's authority over supplemental projects and its obligation to review transmission plans just as it does today as the regional planner for other transmission projects; and subject the projects to PJM's competitive window process as applicable. The Ohio FEA notes that transmission service, pricing and cost allocation are under FERC's exclusive jurisdiction. PJM's uncertainty as to its authority leaves an "attractive regulatory gap" between state and federal jurisdiction that results in, practically speaking, no regulatory supervision, over actions taken by transmission owners that are causing a large uptick in investment and prices for monopoly transmission service. The Ohio FEA recommends that FERC not grant any incentives to PJM supplemental projects without first resolving PJM's authority and obligation regarding regulatory oversight and cost allocation of these projects.

The Ohio FEA disagrees that a changing electric grid necessitates the awarding of incentives for transmission investment that goes above and beyond NERC's reliability standards and requirements. Electric grids are constantly changing. NERC and the RTOs/ISOs are tasked with maintaining reliability in the context of this constant change.

PJM continues to meet this challenge for Ohio and the region. In PJM's recently published 2019 Ohio State Infrastructure Report,¹¹ the RTO noted no reliability concerns or problems. Similarly, the Independent Market Monitor noted no reliability issues in its Report to the PUCO on Transmission Congestion in Ohio, issued May 15, 2020.¹² Without evidence of reliability issues that warrant incentives for this investment, the Ohio FEA cannot at this time, and with the lack of evidence presented by FERC for the need for this incentive, support a ROE incentive for extra reliability benefits of 50 basis points.

C. Incentive ROE Cap

The NOPR proposes to establish a 250-basis-point cap on total ROE incentives granted to a public utility in place of the current policy of limiting ROE incentives to the public utility's zone of reasonableness.¹³

As discussed above, the Ohio FEA strongly believes a determination that transmission costs are just and reasonable must be a cornerstone of FERC's incentives policy. The 250-basis-point number is arbitrary and not based on a meaningful assessment of just and reasonableness. Furthermore, the Ohio FEA notes that FERC's position on the 250-basis-point cap seems inconsistent and unworkable.

¹¹ Available at: <https://www.pjm.com/-/media/library/reports-notice/state-specific-reports/2019/2019-ohio-state-infrastructure-report.ashx?la=en>.

¹² Available at: https://www.monitoringanalytics.com/reports/Reports/SR2020/IMM_Report_to_the_Ohio_Public_Uilities_Commission_Congestion_in_Ohio_2020_20200515.pdf.

¹³ NOPR at P 76-82.

The Commission recognizes that “[c]onsistent with Congressional directive in FPA section 219(d), all ROE incentives must be just and reasonable.”¹⁴ The Ohio FEA agrees. Yet, FERC states that ROE incentives may “exceed the zone of reasonableness”¹⁵ without recognizing that a symmetrical application of this view must also allow that a ROE allowance in a particular case could fall outside and below the otherwise identified zone of reasonableness. According to the Commission, ROE incentives are not required to be bound by the zone of reasonableness in order to be just and reasonable. FERC provides this reason—that the returns provided by base ROE serve a different purpose than ROE that attracts new investment. This different purpose, FERC argues, requires that “ROE incentives may be just and reasonable under different circumstances than base ROEs.”¹⁶ Any such differing circumstances, the Ohio FEA believes, would not require an arbitrary, one-way, basis-point cap in place of a just and reasonable determination under the FPA. And, it should go without saying that, if an incentive exceeds the zone of reasonableness, then it is no longer reasonable. Therefore, Ohio FEA does not support the arbitrary, 250-basis-point cap.

¹⁴ NOPR at P 76.

¹⁵ NOPR at P 76.

¹⁶ NOPR at P 78.

D. Incentives for RTO Participation

The NOPR proposes to increase the adder for RTO participation from 50 points to 100 points for all utilities that join or remain a member of an RTO, regardless of whether the utility's participation in the RTO is voluntary.¹⁷

The Ohio FEA renews its objection to the existing 50-basis-point incentive for RTO participation and opposes the expansion of the incentive to 100-basis-points as proposed in the NOPR. The Ohio FEA believes that this incentive has outlived its usefulness. The transmission landscape has matured dramatically in the years since Section 219 of the Federal Power Act went into effect. RTOs/ISOs have grown in size and scope and have become the rule rather than the exception in much of the country. The Ohio FEA observes that RTOs/ISOs such as PJM and MISO have robust planning processes that address reliability and allow for projects to be built for economic reasons, including reduced congestion.

The Ohio FEA notes that under Ohio law, no entity shall own or control transmission facilities as defined under federal law and located in Ohio on or after January 1, 2001 unless that entity is a member of, and transfers control of those facilities to, one or more qualifying transmission entities.¹⁸ Therefore, we are particularly troubled by the Commission's proposal that the incentive apply to transmitting utilities regardless of the voluntariness of their participation. An "incentive" is commonly defined as something that motivates someone to an action. Here, the Commission is proposing to

¹⁷ NOPR at P 5-6, 97-99.

¹⁸ ORC §4928.12(A)

apply an “incentive” even in instances where it admits the “incentive” will not actually change the behavior of the entity being “incentivized”. Call it what you will, but this most certainly is not an incentive. It is more appropriately characterized as a financial gift from the Commission to Transmission Owners, with no corresponding benefit to the customers who are left to pick up the tab for the Commission’s generosity. Public utilities should not receive incentives for behaviors that they are already required by law to perform particularly when they are already receiving just and reasonable compensation for the service they are obliged to render.

The Ohio FEA recognizes the value that can be provided by RTO participation. But transferring a substantial part of this value from end-users to Transmission Owners in the form of an ineffective “incentive” does not create new value. In fact, the higher ROE may actually be counter-productive towards the goal of encouraging transmission build, as it will make potential projects less cost effective and therefore less attractive from the perspective of the end-user or the retail regulator. The ROE incentives for RTO/ISO participation should not double. They ought to be eliminated outright.

E. Incentives for Transmission Technologies

The NOPR proposes to offer public utilities incentives for transmission technologies that, as deployed in certain circumstances, enhance reliability, efficiency, and capacity, and improve the operation of new or existing transmission facilities. The NOPR also proposes that these technologies will be eligible for both: (1) a stand-alone, 100-basis point ROE incentive on the costs of the specified transmission technology

project; and (2) a two-year specialized regulatory asset. Further, the NOPR proposes to give pilot programs a rebuttable presumption of eligibility for these incentives without offering any reasoning that connects the presumed condition (ROE incentives) with pilot program predicate.¹⁹

As FERC explains in the NOPR, the deployment of advanced technologies is currently evaluated as part of the overall nexus analysis when an incentive ROE is sought; there is no standalone incentive for advanced technology. FERC concludes that “experience to date” suggests that this approach to incentivizing the deployment of advanced technologies is not effective.²⁰ FERC does not provide evidence to support this conclusion and does not elaborate on what would be desirable in terms of the necessary level of advanced technology deployment .

The Commission declines to list the types of technologies eligible for transmission technology incentives. Instead, FERC states that it will make a case-by-case determination of eligibility based on the characteristics of the technology and the benefits that the technology offers. The Ohio FEA understands the Commission’s reluctance to produce an exhaustive list of eligible advanced technologies. However, the Ohio FEA urges FERC to elaborate on the desirable characteristics or benefits and provide additional clarity regarding which types of technologies will be eligible. The only examples provided in the NOPR are “(1) advanced line rating management; (2) transmission topology optimization; and (3) power flow control.” While the Ohio FEA

¹⁹ NOPR at P. 100-113.

²⁰ NOPR at P. 100.

supports the deployment of such technologies to improve the current underutilization of the transmission system, the Commission has not provided adequate detail as to why or how these technologies would require transmission incentives; or why these are the only types of technologies cited in the NOPR.

Furthermore, the Commission mentions energy storage technology in the Background section of the NOPR in the context of discussing technological innovations.²¹ But then the Commission does not explain whether storage technology would be eligible for the transmission technologies incentive. The Ohio FEA notes that this leaves much unknown in terms of which technologies could be eligible for the 100 basis-point ROE incentive and the two-year regulatory asset.²²

The Ohio FEA recognizes that the traditional approach of primarily relying on new construction to meet changing transmission needs is slowly shifting to embrace more efficient approaches to managing the transmission system using preferred advanced technology solutions such as battery storage, flow control devices, and demand response. Such projects have become known as non-wires alternatives (NWAs), and are proliferating across the country. Currently in Ohio, NWAs are being defined as electricity grid investments and programs that use nontraditional distribution solutions (e.g., technologies, pricing, markets, tariffs, and contracts).²³

²¹ NOPR at P. 28.

²² On a relevant note, Ohio EDUs are seeking PUCO-approval to deploy energy storage pilot projects, individually and concurrently with other third parties. The application of these pilot projects align with Ohio's NWA suitability criteria and grid needs to explore multiple and stacked values that may be realized. However, under the current regulatory structure in Ohio and required FERC accounting rules, the ownership and operation of energy storage, as it relates to the utilization of storage as a supply source is unclear.

²³ Report - Final Distribution Planning Workgroup (PWG), PUCO Case No. 18-1596-EL-GRD, Filed 1/16/2020, Page 10.

In view of the potential incremental value that behind the meter and in front of the meter NWAs and energy storage investments provide to the bulk power system and the potential of maximizing the value stream for NWAs at both the retail and wholesale-level, the Ohio FEA would like to highlight some findings and recommendations that are based on recent developments in Ohio's ongoing grid modernization initiative.²⁴ Given early-stage discussions on the topic of NWA opportunities in Ohio and a lack of statutory requirements as they relate to NWA opportunities, it has been premature to develop a comprehensive list of non-traditional technologies and their characteristics or benefits since there is the lack of a uniform NWA evaluation framework. In the course of current distribution system planning, any evaluation of an NWA opportunity by Ohio's Electric Distribution Utilities (EDUs) is done on a location specific, case-by-case basis.

Furthermore, the Ohio FEA notes that recent pilot-project applications, as well as the steady deployment of NWAs in Ohio, are requiring such case-specific evaluation of projects to be able to establish pertinent frameworks and incentives based on the characteristics of the NWA technology and the benefits that the technology offers. These pilot projects are being conducted to evaluate multiple or preferred technologies that maximize overall value of the project.

Provided the Commission delivers clarity regarding which technologies are eligible for this incentive, and provided there will be a holistic evaluation of the need for

²⁴ In 2018, the Public Utilities Commission of Ohio's (PUCO) established a Collaborative and two stakeholder workgroups including a Distribution System Planning Workgroup (PWG) to explore topics on grid modernization. The PWG documented their findings in a report that was filed in PUCO Case No.18-1596-EL-GRD. The report includes recommendations on NWAs, which are defined as electricity grid investments and programs that use nontraditional distribution solutions (e.g., technologies, pricing, markets, tariffs, and contracts), as well as recommendations for furthering energy storage development in Ohio.

deployment of the particular advanced technology, the Ohio FEA supports FERC's proposal to allow the case-by-case determination of eligibility for transmission technology incentives based on the characteristics of the technology and the benefits that the technology offers, since such evaluation will allow for the consideration of new and innovative technologies. These cases by case determinations should stand or fall on their merit without the benefit of a presumption that tilts the just and reasonable scale.

F. Mechanics and Implementation

FERC explains that to ensure that existing and proposed incentives are successfully meeting the objectives of FPA section 219, the Commission needs industry data, projections, and related information that detail the level of investment and the costs and benefits of transmission projects. FERC states that experience to date suggests that current information collection related to FPA section 219 incentives is insufficient to determine the effectiveness of individual incentive grants, or to evaluate the Commission's overall incentives program. FERC suggests that there are several areas of improvement that can be made to FERC Form-730's (Form-730) design to collect the necessary information without imposing undue burden on incentive recipients.²⁵

The Ohio FEA strongly supports FERC's proposal to implement verifiable and quantifiable metrics to measure the performance of the transmission utility. The Ohio FEA suggests review of existing transmission facility utilization factors prior to granting incentives for additional facilities. Under such an approach, the Ohio FEA recommends

²⁵ NOPR at 115-117.

that FERC expand its existing Form-730 to require utilization information and other metrics it determines necessary to measure performance of the transmission utility. The Ohio FEA believes that performance-based ratemaking should be further explored by FERC and interested stakeholders through a technical conference or other means.

The Ohio FEA supports limiting the duration of transmission incentives if there is a material modification of a project or a significant change in the expected benefits. If a project is no longer meeting the criteria that were necessary for the incentive to be granted, then that project clearly should no longer be receiving the incentive. Regarding mechanisms for measurement and verification, the Ohio FEA encourages FERC to require information pertinent to the incentive be included as part of the transmission developer's existing Form-730 reports.

The Ohio FEA supports a case-by-case review of transmission incentives rather than an automatic granting. The burden of proof for the necessity of an incentive ought to be borne by the project developer. Each project must be required to demonstrate that it produces benefits or faces exceptional risks for which an incentive is appropriate. An automatic approach removes any such obligation. Evaluating incentives on a case-by-case basis is the only way to ensure that only projects that truly justify preferential treatment are granted incentives. If the incentive is perceived by transmission developers as the default, rather than the exception, then it is no longer serving its purpose.

IV. CONCLUSION

The Commission is right to consider substantial revisions to transmission incentive policies that have outlived their usefulness or overcompensate developers at the expense of ratepayers. Some elements can be abolished altogether while others should be rewritten to ensure just and reasonable compensation for the risks and rewards of transmission projects. Prudency reviews, metrics, and other controls can add to the integrity of federal policy and we support any movement toward greater accountability – from inception and throughout the useful life of projects. We strongly believe the granting of incentives ought to occur only in exceptional circumstances. If the Commission cannot reasonably determine that the incentive actually motivated a change in behavior, then the incentive should not be granted. Perhaps Commissioner Glick sums it up best when he states, “Nevertheless, while I support the shift to benefits, I am concerned that the NOPR omits what should be a bedrock principle of any effort to administer section 219: *That incentives must actually incentivize something. A payment that does not incentivize anything is a handout, not an incentive.*”²⁶

The Ohio FEA thanks FERC for raising sweeping questions about the present and future state of transmission development, and for considering our recommendations on how to address that future.

²⁶ Commissioner Glick’s partial dissent in RM20-10, at P. 2, March 25, 2020 (emphasis added).

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas Lindgren
Thomas Lindgren
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3414
614.466. (telephone)
614.644.8764 (fax)
john.jones@ohioattorneygeneral.gov
thomas.lindgren@ohioattorneygeneral.gov

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served in accordance with 18 C.F.R. Section 385.2010 upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Thomas Lindgren
Thomas Lindgren
Assistant Attorney General

Dated at Columbus, Ohio, this July 1, 2020.

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Summary: Comments of The Public Utilities Commission of Ohio's Office of The Federal Energy Advocate electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO