



## **Industrial Energy Consumers of America**

*The Voice of the Industrial Energy Consumers*

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October 4, 2017

The Honorable Neil Chatterjee  
Chairman  
Federal Energy Regulatory Commission (FERC)  
888 First Street, NE  
Washington, DC 20426

Dear Chairman Chatterjee:

***Re: Grid Resiliency Pricing Rule, Docket No. RM18-1-000***

On behalf of the Industrial Energy Consumers of America (IECA), we are concerned about the process and deadlines of the proposed Grid Resiliency Pricing Rule, Docket No. RM18-1-000. As a large stakeholder who consumes 26 percent of U.S. electricity and spends approximately \$65 billion on electricity each year, the manufacturing sector is very concerned about this rule. We urge FERC to not accept the 60-day timeline for obtaining public comments and finalizing the rule.

The proposed rule is significant and would have major negative impacts to organized markets and result in higher prices which directly impacts the competitiveness of the manufacturing sector, but especially electricity-intensive manufacturing industries. For example, even a one cent increase in industrial electricity rates would increase our costs \$9 to 10 billion a year.

IECA encourages FERC to solicit a public comment period of at least 90 days, followed by a response to comment period afterwards. We also desire for FERC to hold a technical conference before the comments deadline.

The proposed rule is too important to rush. Building a thoughtful record on which to make decisions is still the appropriate and necessary way forward. We look forward to contributing to this process.

Sincerely,

Paul N. Cicio  
President

cc: The Honorable Rick Perry, U.S. Department of Energy  
Senate Committee on Energy and Natural Resources  
House Committee on Energy and Commerce

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*The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.0 trillion in annual sales, over 2,600 facilities nationwide, and with more than 1.7 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.*