



Industrial Energy Consumers of America

The Voice of the Industrial Energy Consumers

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October 22, 2019

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

The Honorable Bernard McNamee
Commissioner
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

The Honorable Richard Glick
Commissioner
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Dear Chairman Chatterjee, Commissioner Glick and Commissioner McNamee:

On behalf of the Industrial Energy Consumers of America (IECA), we thank you for opening an investigation into how three grid operators exempt transmission projects from federally mandated competitive bidding processes. Increased oversight is overdue. Electric transmission costs, as a percent of our electric bills, have been our single largest energy cost increase over the last decade (see figure 1).

We are referring specifically to the following three dockets: PJM (Docket No. EL19-91-000), Southwest Power Pool (Docket No. EL19-92-000) and ISO-New England (Docket No. EL19-90-000). The so-called “immediate-need transmission projects” appear to be a convenient loophole to avoid being subject to the competitive processes mandated by FERC Order 1000.

Thank you for your leadership.

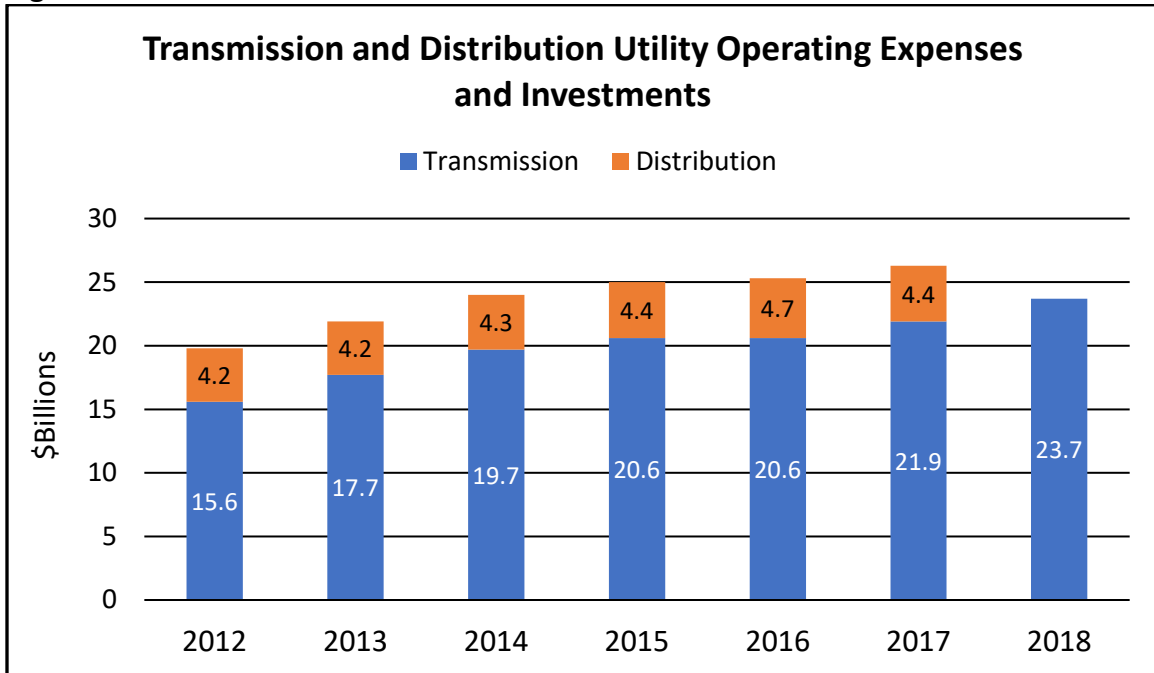
Sincerely,

Paul N. Cicio
President

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.0 trillion in annual sales, over 3,700 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.

Figure 1



Source: Electric Power Annual, U.S. Energy Information Administration (EIA), Edison Electric Institute (EEI)