

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

**Interregional High Voltage Direct) Docket No. AD22-13-000
Current Merchant Transmission)**

**COMMENTS OF THE
ELECTRICITY CONSUMERS RESOURCE COUNCIL (ELCON)**

The Electricity Consumers Resource Council (ELCON) respectfully submits these comments on Invenergy Transmission LLC’s (Invenergy) Request for a Technical Conference (Request)¹ in the above-captioned docket, in which Invenergy requests that the Federal Energy Regulatory Commission (FERC or Commission) hold a technical conference to explore ways to remove barriers to the development of interregional merchant high voltage direct current (MHVDC) transmission.

ELCON is the national association representing large industrial consumers of electricity. ELCON member companies create a wide range of products from virtually every segment of the industrial community. We own and operate hundreds of major facilities and are significant consumers of electricity in the footprints of all organized markets and other regions throughout the United States. Reliable electricity supply at just and reasonable rates is essential to our members’ operations. Further, ELCON members rely on the transmission of electricity by FERC-jurisdictional utilities. Accordingly, the outcomes of a FERC Technical Conference on interregional MHVDC could have a direct financial impact on ELCON members.

In its Request, Invenergy asserts that interregional transmission is crucial to ensuring reliability and resilience as the electricity grid experiences increasingly severe

¹ Invenergy Transmission LLC, Request for Technical Conference re: Interregional Merchant High Voltage Direct Current Systems (filed Nov. 10, 2022); Supplemental Comments of Invenergy Transmission LLC in Support of Request for Technical Conference (filed Feb. 10, 2023).

weather events.² Further, Invenergy states that “interregional MHVDC systems support reliability and resilience, help alleviate backlogged interconnection queues, and deliver economical generation to load... [and] avoids protracted stakeholder proceedings and contentious cost allocation issues”³ Invenergy avers that “[w]ith respect to MHVDC systems... developers, *not ratepayers*, bear the risk and provide the capital.”⁴

While ELCON does not take an official position on Invenergy’s proposal to unlock MHVDC, ELCON does support having the Commission take a serious look into the potential of interregional MHVDC policy to increase reliability and resilience and protect ratepayers from financial risk and unjust transmission costs, especially in connection with the Commission’s inquiry into interregional transfer capability.⁵

ELCON supports policies that protect consumers and promote reliable, least-cost transmission solutions. Exploring these issues further in a technical conference could identify whether the risks and benefits of MHVDC to consumers are fully understood. Therefore, ELCON supports Invenergy’s Request and respectfully encourages the Commission to hold a technical conference so that consumers can be fully briefed on Invenergy’s proposal and provide ratepayers the opportunity to participate in potential solutions.

CONCLUSION

ELCON fully supports Invenergy’s Request for the Commission to hold a technical conference to examine whether interregional MHVDC provides increased reliability and saves consumers from the risks and costs associated with electric

² Request at p. 1.

³ *Id.* at pp. 3,6.

⁴ *Id.* at p. 15 (emphasis added) (footnote omitted).

⁵ *Establishing Interregional Transfer Capability Transmission Planning and Cost Allocation Requirements*, Supplemental Notice of Staff-Led Workshop, Docket No. AD23-3-000 (Nov. 18, 2022)

transmission development. ELCON respectfully requests that if the Commission grants Invenenergy's Request for a technical conference, that ratepayers have a seat at the table to provide input, ask questions, and participate in potential solutions.

Respectfully submitted,

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