

2024



State Permitting Policies & Best Practices for Electrical Transmission in the Northeast-Midwest Region



Eva Kappas

Policy Intern, Northeast-Midwest Institute
eva_kappas@brown.edu

Table of Contents

Executive Summary	3
Introduction	5
Background: Federal, State and Local Permitting	7
Siting 101	10
The Siting Authority	10
Public Comments & Intervenors	11
The Environmental Review	13
Policy Tools:	14
Policies for Shortened and Clarified Procedures	15
Policies for Public Participation & Consideration	23
Conclusion	27
Opportunities for Further Study	28
Endnotes	30
About the Northeast-Midwest Institute	35

Figures:

- A: The State Siting Process
- B: State Siting Authorities in the Northeast-Midwest
- C: Consideration of Public Comments in Siting Procedures in the Northeast-Midwest
- D: Distribution of Permits Needed to Site Electrical Transmission in the Northeast-Midwest

Executive Summary



Note: Endnotes are bracketed as [#] and attributed on page 30.

In recent years, renewable energy generation has exploded to encompass over 85% of new utility capacity. [1] Yet the permitting process for both renewable energy facilities and the transmission lines needed to connect them to the electrical grid remains a major barrier to the deployment of low-carbon energy. Improved transmission permitting specifically could facilitate the clean energy transition by making the interconnection and transportation of renewable resources to areas of energy more efficient. From Capitol Hill to the boardrooms of state Public Utility Commissions, lawmakers, activists and renewable energy developers alike have called for a “streamlining” of permitting processes to enable the buildout of transmission lines. Whether the process is federal, state, or local, the same diffuse suggestions resound: Increase coordination. Eliminate duplicative steps. Enhance information accessibility. But what do these ideas look like in practice? What specific procedures of permitting processes can be combined, expedited, or clarified?

This report examines the current permitting process for transmission lines in the 18 states of the Northeast and Midwest. It provides the context for state permitting; describes the state permitting process, specifically the process of siting transmission lines (“siting process”); and it highlights key differences in state procedures that create space for innovation and improvement. The report concludes by offering 16 policy recommendations, each with an explanation and case study on its implementation, that enable state legislators to shorten the permitting process while preserving public participation. The policy recommendations to achieve both of these goals are summarized on the next page.

Executive Summary



Policy Goal A: Shorten and Clarify Permitting Procedures

Final Policies

1. Consolidate Approvals into One Permit Under Siting Authority
2. Establish an Energy Facility Siting Board
3. Create Expedited Options and Exemptions
4. Set Statutory Timelines
5. Consider State Emissions Reduction Goals in Siting Decisions
6. Centralize and Digitize Information
7. Utilize the IRA TSED Program to Increase Staff Capacity
8. Hold Pre-Procedural Meetings

Intermediate Policies:

9. Coordinate Distinct Siting and Environmental Reviews
10. Give Siting Authority Override Over Environmental & Local Review
11. Assign a Hearing Officer to Cases

Policy Goal B: Ensure Public Representation and Consideration

12. Consider Public Comments in Permit Decision
13. Provide Accessible and Plain-Language Communications
14. Designate Intervenors and Intervenor Funding
15. Require Municipality Recommendations
16. Require Developer to Fund Impact Studies for Municipalities

Introduction



To meet the demands of a growing and increasingly electrified society and combat escalating climate disasters, the Department of Energy estimates that the United States needs to expand our electricity transmission system by 60% by 2030 and may need to triple it by 2050. [2] Since the 1960s and 1970s, our electrical infrastructure has suffered from a lack of attention and investment, compounded by extensive permitting requirements for those initiatives that do secure funding. The current dearth of transmission has had human consequences. In 2021, blackouts during Texas Storm Uri triggered shortages of food, water, and heat, killing at least 200 people. [3] A single transmission line connecting the Texas grid to the Southwestern Power Pool right across the border in Arkansas could have saved lives. American lives depend on an electrical system that does not blink out during increasingly frequent extreme weather events.

The keystone to an expanded, resilient, decarbonized electricity supply is bulk transmission. Bulk transmission is the system of high-voltage electrical lines that transport energy from the generation site to the distribution network of smaller, neighborhood-scale power lines. With large steel towers and overhead wires, bulk transmission lines can be seen alongside highways or cutting through open fields. The reasons for the current scarcity of bulk transmission is multifold. First, the need for these lines has not been easily identifiable. Utilities are not incentivized to build electrical lines outside of their jurisdictions, leaving gaps between their operating regions. Only recently has the federal government stepped in to conduct a national transmission planning study to assess inter-regional needs. Second, even when the potential for a transmission is identified, bulk transmission is notoriously difficult to finance due to its large capital outlay and nebulous construction timeline.

The third barrier to transmission development is the permitting process, an intricate, multi-layered adventure through bureaucracy and contentious public hearings. Permitting refers to the process of obtaining all the necessary approvals, from federal agencies down to the local township, to break ground on a project, a process which can last more than 15 years. [4] While federal permitting reform has gained media and legislative attention on the national stage, there has been little to no study of the state's role in permitting, though a single state permit can take up to 4 years to obtain [5].

For interstate transmission developers, complications of permitting do not end with one state. Long-range transmission lines must pass through multiple state processes with little consistency in methods and no opportunities for reducing the burden through coordination between states. Across states, the same agency will have different names. Permits may be called licenses or approvals; their requirements and steps, while accomplishing many of the same objectives, are buried in nearly incomparable processes.

“Permitting” has become a catch-all term for distinct federal, state, and local approval processes, each with their own sub-approvals and intricacies. In order to assess opportunities for tightening a high-impact process, we must disentangle these three levels of permitting and narrow in on the crucial intermediate steps that have received the least regard. Furthermore, we must critically examine what “streamlining” means in the context of democratic and participatory procedures. The mandate of “streamlining” implies that a process has steps that can be cut, requirements that can be reduced, and a timeline that can be shortened. It also assumes that shortening such a timeline is a societally beneficial goal. However, it is important to consider that certain procedures are lengthy for a reason. Permitting processes must take into account constituent interests, environmental preservation, and economic activity. Without a complete understanding of the permitting process and the interests it represents, “streamlining” efforts could suffocate public representation in the interest of cutting red tape. This report will outline the permitting process and examine key differences between state procedures to provide thorough context for the evaluation of policies to reform state permitting.

Background:

Federal, State and Local Permitting

Three tiers of permits are required for bulk transmission projects: federal, state, and local. On the federal level, the main authorization required is an environmental impact review. Because of the scale of long-range transmission lines, most projects end up crossing federal land. In order to grant land access to the developer, the federal agency responsible for the land must first assess the environmental effects of their proposed action in accordance with the National Environmental Policy Act (NEPA). While other laws such as the Endangered Species Act and the National Historic Preservation Act will also be triggered by requests to develop federal lands, the NEPA environmental review process is the most rigorous, taking up to 7 years. [6]

But the federal permit is only half the story. States have their own version of the NEPA process, fragmented across multiple permits required for construction. These permits include a siting permit, environmental permit, wastewater discharge permit, and transportation permit. The permit this report is concerned with—the permit which requires the most time and resources for an uncertain result—is the siting permit. The siting permit is usually called a “Certificate of Public Convenience and Necessity” or “Certificate of Public Good” and is issued by the state siting authority (see Figure B). The siting permit gives the developer permission to build at or along a specific area. While the siting process differs by state, most procedures share a series of key events, including a public comment hearing, state agency recommendations, and an evidentiary hearing similar to a court case at which parties provide expert testimony and cross-examine witnesses. Based on the evidence presented at the hearing and in public comments (in some cases), the siting authority decides whether or not to issue the permit and if any conditions apply. For an overview of the siting process, see Figure A.

Efforts to reform the state permitting process thus far have mainly taken the form of extending federal authority over state procedures. In 2021, the Bipartisan Infrastructure Law expanded the Federal Energy Regulatory Commission (FERC)’s permitting authority over projects in designated National Electric Interest Transmission Corridors (NEITCs), allowing the agency to approve a line if the state has denied a permit for the project or not acted on the permit within a year. [7]

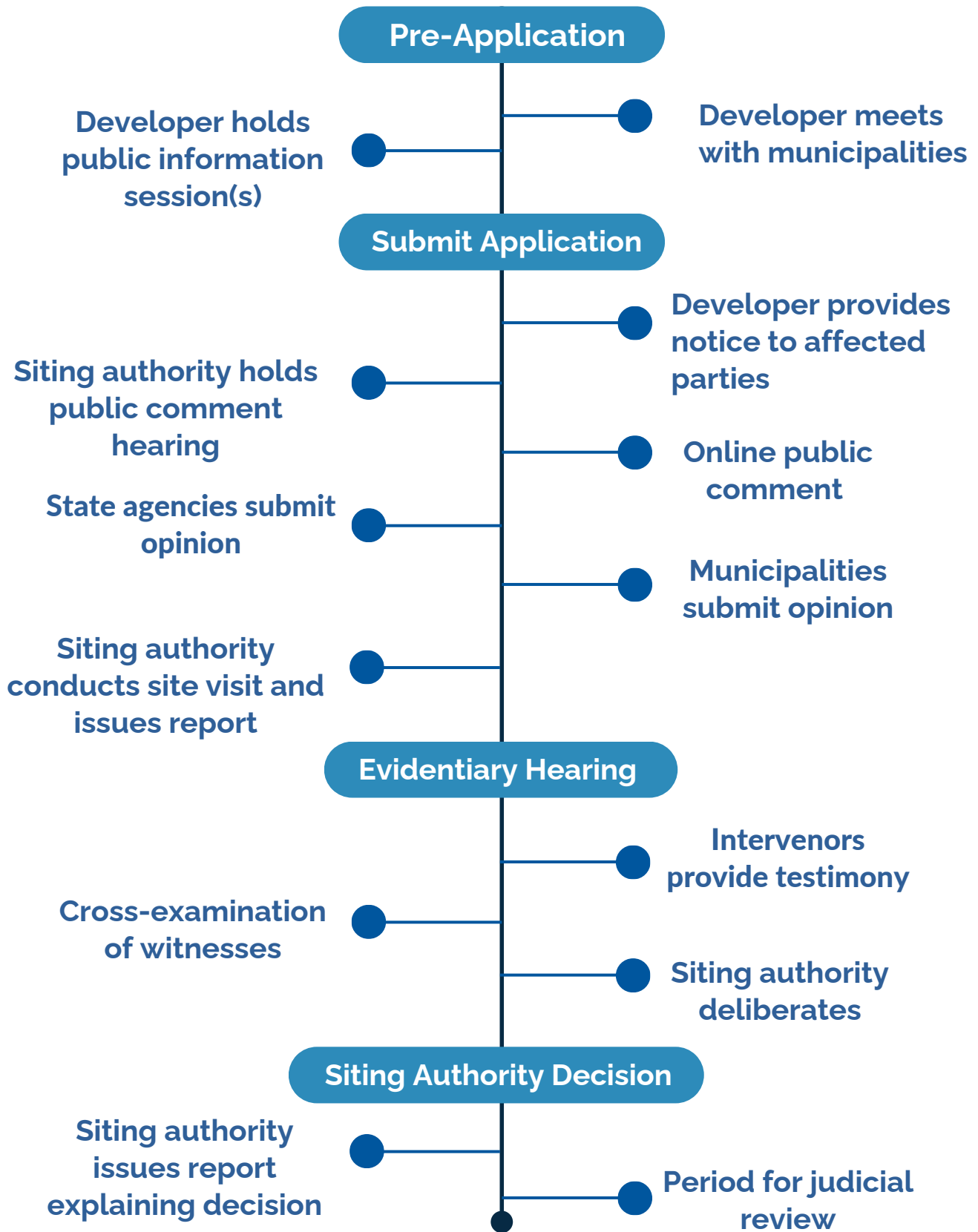
Senator Joe Manchin (D-WV) reintroduced a permitting reform bill in 2023 that would allow the FERC to authorize interstate transmission lines in NEITCs *without* waiting for state denial or inaction. [8] Senator Manchin’s bill would also give transmission developers that received a permit from FERC eminent domain powers over state-owned land. But such federal directives risk the backlash of federalism while disregarding the capability of the state to advance transmission buildout in the area it knows best. State legislators and agency commissioners have the responsibility and capability to reform their permitting processes to their citizens’ benefit.

In addition to the main state siting permit, further approvals or permits may be required by local authorities. Generally, local permits are less procedurally rigorous than the state permit but may be held up by public opposition.

One final aspect of interstate permitting is the need for Regional Transmission Organization (RTO) approval in order for a new transmission line to connect to the electrical grid. As a non-governmental organization, the RTO is not directly involved in state permitting; however, as grid operators, their permission is required for any project to connect to the grid. The RTO approval process, often called the interconnection process, is an issue in and of itself that is outside the scope of this report. The FERC has taken steps to address the question of expediting interconnection. [9] To learn more about interconnection delays and how building more bulk transmission lines is their primary remedy, see the Rocky Mountain Institute’s report on interconnection queue reform. [10]

The following Figure A illustrates the state siting process. This is a generalized diagram, and state procedures may depart from the exact chronology of the flowchart below.

Figure A: The State Siting Process



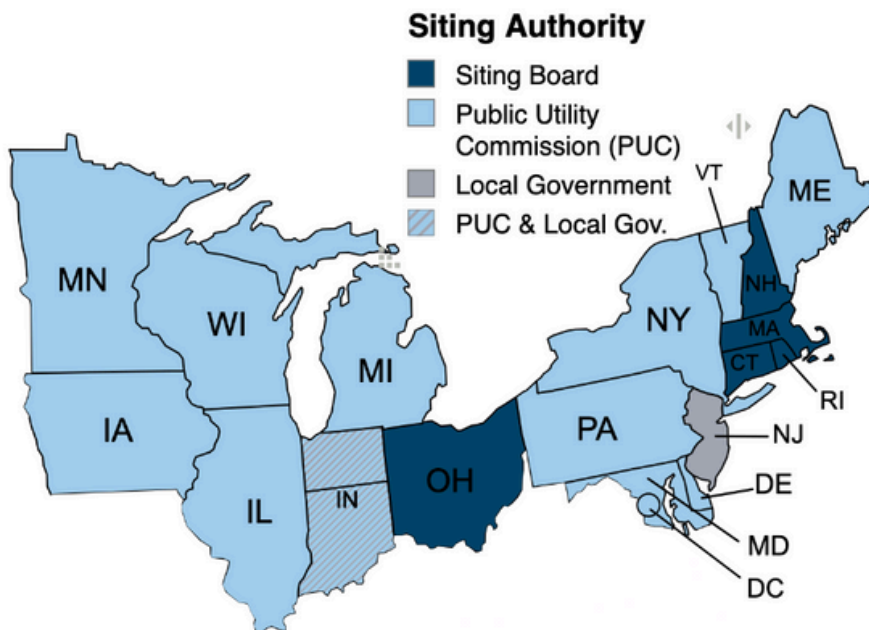
Siting 101:

Across the Northeast and Midwest regions, three aspects of the siting process can substantially differ. The siting authority, the power given to public comments and legal intervenors, and the distribution of approvals across one or multiple permits all play a role in the efficacy and accessibility of a siting process. In this section, this report dives into each of these elements of the siting process and their manifestations in the Northeast and Midwest. In the following section, Policy Recommendations, this report offers case studies of states with notable policies in each of these three areas.

The Siting Authority

In the Northeast and Midwest, states designate an agency to handle siting permits, referred to in this report as the “siting authority.” The specific agency depends on the state, as illustrated by the following Figure B.

Figure B: State Siting Authorities in the Northeast-Midwest



Across the Northeast-Midwest region, states designate an agency to manage and approve siting applications, or else leave siting permission up to local governments.

In most states, the Public Utility Commission (PUC), also called the Public Service Commission or the Board of Public Utilities, manages the siting process. While their main role is regulating electricity prices, as the agency responsible for governing all electric, gas, telecommunications, water and waste utilities, PUCs have the mandate to determine that infrastructure projects proposed by both utilities and merchant developers (non-utility asset construction and management companies) do not threaten economic, recreational, aesthetic, and environmental land uses or unduly raise electricity prices for customers.

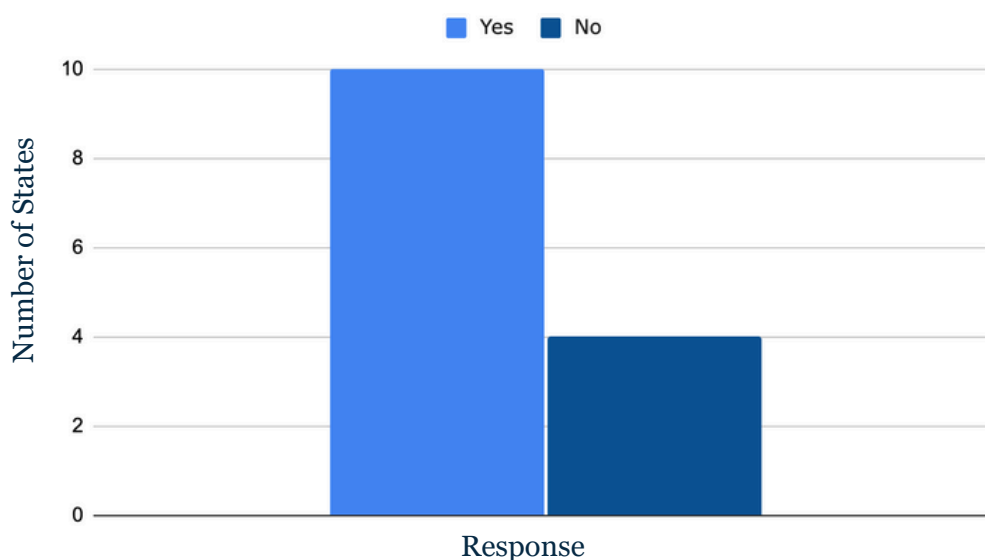
Five states in the Northeast-Midwest have created Siting Boards to handle energy facility and other infrastructure siting permits. A Siting Board is usually made up of the heads of state agencies, including the PUC, department of the environment, department of commerce, and other relevant agencies, as well as expert members of the public. [11] Unlike the PUC, the Siting Board only handles matters related to infrastructure siting. The siting process under a Siting Board does not substantially differ from the process under the PUC, but a Siting Board may have more capacity to set transmission-specific exemptions and designate staff for processing applications.

A few states choose to delegate siting authority partially or entirely to local governments. While this may seem expeditious, it also allows a single local government to kill a project.

Public Comments & Intervenors

There are two ways the public can participate in the siting process: by submitting public comments or by participating in the evidentiary hearing as a formal intervenor. Anyone can submit a public comment. During the public hearing, members of the public can voice concerns and dialogue directly with the developer. Written comments can be submitted online. However, only in some states are public comments entered into the evidentiary record upon which the siting authority makes its decision. For example, in Maine, public comments are read by Staff and Commissioners, but facts contained in these comments cannot be considered as evidence in a case unless they are sworn by a formal intervenor. [12] In Maine, Michigan, Maryland, and Vermont, public comments do not count as evidence. The following Figure C shows the relative frequencies of states entering or not entering public comments in the evidentiary record.

Figure C: Do Public Comments Count in the Siting Decision?



In the Northeast-Midwest region, states differ in the authority they give to public comments. Only in some states are public comments entered into the evidentiary record upon which the siting authority renders its decision. Note: Delaware and Indiana are excluded because their siting process is primarily local.

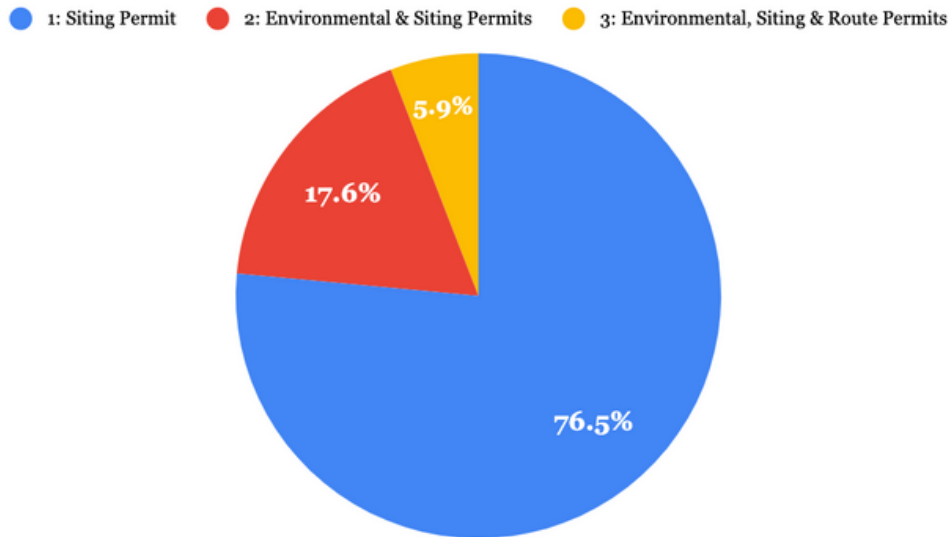
In these states, to ensure that their perspective is considered, interested parties can apply for intervenor status, which requires submitting a Motion to Intervene that explains how the intervenor is not adequately represented by an existing party to the case. Because of the time commitment of intervening and the cost of legal fees, usually intervenor status is only obtained by the incumbent utility, environmental law firms, established organizations such as the Sierra Club, and highly-organized local groups. Intervening groups will hire witnesses such as engineers and consultants to provide expert testimony. The technical quality of intervenor testimony is usually higher than that of public comments, though it does not necessarily represent public sentiment.

Some states grant intervenor status automatically to relevant parties, such as landowners whose property is directly impacted by or abuts the transmission line. [13] Minnesota goes further to allow that any person may appear at the hearings, ask questions of other witnesses, and offer testimony and exhibits without the necessity of intervening as a formal party to the proceedings, however, their comments will not be taken as though they were a formal party. [14]

The Environmental Review Process

While 76.5% of states in the Northeast-Midwest require only one permit for siting, about 18% of the states require two or more permits to construct a facility. The following Figure shows the frequency of each combination of required major permits.

Figure D: Number and Type of Permits Required to Site Electrical Transmission in the Northeast-Midwest



Up to three permits are needed to site transmission lines in the Northeast-Midwest, in addition to ancillary permits for the transportation of materials, wastewater disposal and compliance with local regulations. The three major permits can include a siting environmental impact, and/or route permit.

Usually, a siting permit considers all of the impacts of a transmission line. The purpose of an additional permit, usually an environmental permit issued by the state environmental agency, is ideally to ensure that a proposed project does not adversely impact natural or aesthetic resources. For example, in Maine, the Department of Environmental Protection must issue a Site Location and Development Permit before the PUC can issue a Certificate of Public Convenience and Necessity (the siting permit). [15] The Site Location and Development Permit process is nearly identical to that of the Certificate, but is still required to occur before the Certificate process in its entirety. Massachusetts, Minnesota, and Wisconsin, states with separate environmental and siting permits, have coordinated the two procedures to run in parallel timelines, but the need for multiple permits unnecessarily fragments the siting authority. [16] States with a single siting permit take environmental concerns into account by including a consideration of environmental impacts in the criteria under which the siting authority evaluates applications, and soliciting the opinion of the state environmental agency in writing or in oral testimony at the evidentiary hearing.

Policy Tools

To address long timelines managed by overburdened siting authorities, enhance public representation through commenting and intervenor forums, and streamline project evaluation by consolidating duplicative environmental and siting permits, state legislators must enact changes to laws governing the siting authority and process. Below are policy recommendations for state legislators to enable the buildout of transmission lines through siting reform. In consideration of the social as well as environmental dimension of infrastructure siting, recommendations are organized into two sections: first, policies to shorten and clarify the permitting timeline; and second, policies to maintain and enhance public representation. Recognizing that not all states have the administrative or political capacity to overhaul their siting procedures, policies to shorten and clarify the permitting timeline are broken into two categories: final policies and intermediate policies. The policy recommendations to achieve each policy goal are summarized below. Each policy recommendation is then explained, with a case study on its implementation.

Policy Goal A: Shorten and Clarify Permitting Procedures

Final Policies

1. Consolidate Approvals into One Permit Under Siting Authority
2. Establish an Energy Facility Siting Board
3. Create Expedited Options and Exemptions
4. Set Statutory Timelines
5. Consider State Emissions Reduction Goals in Siting Decisions
6. Centralize and Digitize Information
7. Utilize the IRA TSED Program to Increase Staff Capacity
8. Hold Pre-Procedural Meetings

Intermediate Policies:

9. Coordinate Distinct Siting and Environmental Reviews
10. Give Siting Authority Override Over Environmental & Local Review
11. Assign a Hearing Officer to Cases

Policy Goal B: Ensure Public Representation and Consideration

12. Consider Public Comments in Permit Decision
13. Provide Accessible and Plain-Language Communications
14. Designate Intervenor and Intervenor Funding
15. Require Municipality Recommendations
16. Require Developer to Fund Impact Studies for Municipalities

Policy Goal A: Shorten and Clarify Permitting Procedures

Final Policies

POLICY RECOMMENDATION 1: Consolidate All Permits into One Permit Under the Siting Authority

Example: Rhode Island

In Rhode Island, the Energy Facility Siting Board may take on the issuance of any additional licenses or permits that the developer may need. The state agencies that typically would have jurisdiction to issue additional permits would instead serve as an advisor to the Energy Facility Siting Board regarding approval. The Energy Facility Siting Board collects advisory opinions from these agencies, but does not have to abide by them. [17]

Example: New York

In New York, the Public Service Commission (PSC) handles siting permits for transmission lines. Lines that require a Certificate from the PSC are exempted from environmental review by the New York State Department of Environmental Conservation. [18] To further shorten the process, the proposed Renewable Action through Project Interconnection and Deployment Act of 2024 would require the Office of Renewable Energy Siting (ORES) to promulgate regulations and adopt uniform permit terms and conditions for major electric transmission facilities. [19] The process designed by ORES would allow for specific features to expedite transmission siting, including dispensing with the current requirement that an application assess reasonable alternative locations for the proposed line. The process would also exempt transmission projects that use an existing right-of-way from the application requirement and automatically grant a siting permit if ORES has not made a decision about the permit within one year of the application.

Why:

Most states require transmission lines to obtain a general Certificate of Public Convenience and Necessity from the Public Utility Commission. This one-size-fits-all approach is applied to purposes as disparate as constructing gas pipelines and telephone poles, operating a power plant, and entering into

franchise agreements. Some states have an Energy Facility Siting Act that outlines a process for evaluating major facilities like power plants, transmission lines, and solar farms, but while this narrowed scope allows for some reduction in application requirements, it is still not specific to transmission. Establishing a distinct and singular process for transmission lines would make requirements and timelines clearer for developers and allow for exemptions that cannot be abused for the development of more fossil fuel infrastructure. A consolidated transmission siting permit can employ a common application with the minimum requirements needed to enable siting authority to conduct an efficient review and demonstrate that the applicant has meaningfully consulted with the host community. [20] All other local, regional, and state agencies that would otherwise have a permitting role could participate in the siting process through the issuance of statements of recommended permit conditions, with an opportunity for public comment. [21] A transmission siting process may also contain exemptions or expedited options for transmission lines of different sizes. For a detailed example of a consolidated permit procedure, see the Massachusetts Commission on Energy Infrastructure Siting and Permitting's Recommendations to Governor Maura Healy. [22]

POLICY RECOMMENDATION 2: Establish an Energy Facility Siting Board

Example: New Hampshire, Connecticut, Massachusetts, Rhode Island, Ohio

In New Hampshire, Connecticut, Massachusetts, Rhode Island, and Ohio, a Siting Board, rather than the PUC, is responsible for approving siting permits. The Siting Board takes on all responsibilities, including reviewing applications, holding hearings and receiving public comments. The Siting Board is usually comprised of 3-10 members, including heads of relevant agencies and sometimes public representatives. For example, in Rhode Island, the Siting Board is made up of the Chairperson of the Public Utilities Commission, the Director of the Department of Environmental Management and the Associate Director of Administration for Planning. [23] Massachusetts' Siting Board includes public representatives on labor and energy. [24]

Why:

Public Utility Commissions, which have historically processed siting applications, are overworked and underfunded. Establishing a separate entity

to handle siting permits allocates resources and staff capacity to the siting process while centralizing information under one agency. When establishing a Siting Board, a state must be careful not to continue problems of resource inadequacy plaguing PUCs by appointing agency heads to the Siting Board without reducing their existing responsibilities. Designating full-time staff to the Siting Board is necessary to ensure thorough review and reduced delays.

POLICY RECOMMENDATION 3: Consider State Emissions Reduction Goals In Siting Decision

Example: Maine

In Maine, the Public Service Commission must consider in its decision to issue a Certificate of Public Convenience and Necessity if the project “reduces the release of greenhouse gasses.” [25] This is a rarity among PUC mandates; historically, PUCs have only had to consider the impact of safety, reliability and consumer costs in evaluating applications. Maine added this clause in 2021 by way of amending the statute governing the PUC to require that “the commission, while ensuring system reliability and resource adequacy, shall facilitate the achievement by the State of the greenhouse gas emissions reduction levels set forth in [the Maine Climate Action Plan].” [26]

Why:

While integral to decarbonization and long-term resource stability, transmission lines that interconnect renewable energy facilities may not be seen as necessary for the immediate reliability of a state’s electrical system. Mandating consideration of state greenhouse gas emissions reduction goals creates a framework for the consideration of infrastructure beneficial to public health and decarbonization. An alternative policy to achieve a similar result is mandating consideration of state renewable portfolio standards in permit decisions. A further policy could establish an expedited review process for such lines.

POLICY RECOMMENDATION 4: Create Expedited Options and Exemptions for Lines Along Existing Right-of-Ways or Lines to Interconnect Renewable Energy

Example: Ohio

Ohio has an expedited review process available to lines that are "necessary to

maintain reliable electric service as a result of the retirement or shutdown of an electric generation facility located within the state.” [27] The expedited process has minimal application requirements and has an abbreviated timeline that forgoes the public hearing and public comment period. Instead, the Siting Board conducts an investigation of the Application and submits a staff report which includes recommended findings and conditions for approval. If the Siting Board does not act on the application within 90 days of its filing, the application is automatically approved.

Example: Wisconsin

In Wisconsin, high-voltage transmission lines less than 345 kilovolts are exempt from the siting permit if all related construction activity takes place entirely within the area of an existing electric transmission line right-of-way (defined as within 60 feet of a line that is 69 kilovolts or more) or requires only obtaining half a mile of additional right-of-way from landowners. [28]

Why:

In most states, accelerated review is only available to lines below a certain length or voltage. Creating options for the accelerated review of high-voltage and long-range lines, especially those that enable the closing of a coal or natural-gas power plant, is critical to decarbonization. Exemptions for lines built within existing transmission right-of-ways, such as in Wisconsin, expedite the process while minimizing disruption of community activities. Expedited options can be expanded to include lines built alongside railroads and highways. [29] Ohio’s reliability-based exemption criteria could be strengthened by specifying that accelerated review is available to lines “necessary to achieve reductions in greenhouse gasses” or “meet state renewable energy goals.” States could also pre-approve corridors for transmission development modeled after Texas’s Competitive Renewable Energy Zones. [30]

POLICY RECOMMENDATION 5: Centralize and Digitize Information

Example: Vermont

While not for siting permits, which are handled by the Public Utilities Commission, Vermont’s one-stop-shop for permitting managed by the Department of Environmental Conservation (DEC) provides a good example of a centralized portal for permitting resources, forms and submission. [31]

On the DEC’s website, applicants can use the Permitting Navigator tool to identify required permits, application materials, compliance reports and fee payments.

Why:

Permit applications traditionally require submitting multiple binders’ worth of forms each to multiple agencies, offices and municipalities. Printing, organizing and distributing these materials places a time and resource burden on the developer. Furthermore, the report application format does not lend itself to easy navigation or quick turnarounds by agency staff. Creating one portal to locate information increases the likelihood that projects meet requirements. Vermont’s one-stop-shop can be improved upon by allowing the online submission of forms through the portal and creating a messaging function through which developers can communicate directly with state agencies.

POLICY RECOMMENDATION 6: Set Statutory Timelines for State Agency Comments, Public Comment, Hearings, Deliberation, and Judicial Review.

Example: Rhode Island

In Rhode Island, all steps of the siting process have statutory deadlines. For example, after the Siting Board solicits opinions from the PUC and other relevant state agencies, the agencies have 6 months to render an opinion. Within 15 days of the agency advisory opinion submission date, the Board must schedule a final hearing. Parties to the final hearing must file all direct testimony no later than 10 days before the date of the final hearing. The final hearing is a maximum of 60 days, and the Siting Board must render a decision by either 120 days from end of hearing or 60 days from receiving all direct testimony, whichever is shorter. [32]

Why:

Setting deadlines is an accountability measure that requires state agencies and the public to remain engaged in the case and responsive to each other. Deadlines for testimony and public comments avoid the introduction of new evidence late in the hearing process. Establishing a set timeline for permitting provides greater cost certainty for developers when preparing for construction and peace of mind for the public as to when they can expect decisions. The

Massachusetts Commission on Energy Infrastructure Siting and Permitting recommends a total timeline of no more than 6-15 months, including an evidentiary hearing of no more than 5 days and a deadline to file appeals of 20 days after the final decision. [33]

POLICY RECOMMENDATION 7: Increase Staff Capacity Using Funding from the Inflation Reduction Act's Transmission Siting and Economic Development Program

Example: None; applications are currently being reviewed.

Why:

In August 2023, the Department of Energy created the Transmission Siting and Economic Development (TSED) Grants Program, endowed with \$760 million from the Inflation Reduction Act. [34] The “siting” half of this grant program allows state, local and tribal agencies to apply for funding to conduct studies, participate in regulatory proceedings, and convene stakeholders. Increasing staff capacity at resource-strapped agencies could speed siting approval independent of procedural changes.

POLICY RECOMMENDATION 8: Hold a Preliminary Procedural Conference

Example: Massachusetts (recommended)

The Massachusetts Commission on Energy Infrastructure Siting and Permitting recommends that the siting authority hold a preliminary procedural conference after the submission of an application to delegate specific responsibilities and set a schedule. [35] The siting authority should identify any issues to be addressed during the evidentiary hearing; designate lead agency responsibilities; contact state, regional, and local agencies to provide statements of recommended permit conditions; and disseminate the procedural schedule.

Why:

Directly interfacing early in the application review process decreases the risk of state agencies performing duplicative work and allows critical issues to be raised earlier in the process.

Intermediate Policies: For states in which complete or partial overhaul of siting procedures is politically or administratively difficult, these intermediate policies expedite siting processes within existing procedures.

POLICY RECOMMENDATION 9: Coordinate Distinct Siting and Environmental Review Processes

Example: Wisconsin

In Wisconsin, separate siting and environmental permits are still required. These permits are reviewed by the Wisconsin Public Service Commission (WPSC) and Wisconsin Department of Natural Resources (WDNR), respectively, but the processes are completed concurrently to ensure the route under consideration is approved by both agencies in a timely fashion. [36] In pre-application meetings, WPSC and WDNR will determine their respective obligations related to the Wisconsin Environmental Policy Act (WEPA) and jointly carry out the necessary process to ensure a timely review that fully complies with WEPA.

Example: Minnesota

Minnesota requires three permits to build a transmission line: a Certificate of Need, Route Permit, and Environmental Review (ER). To avoid the delay of sequential approvals, the ER commences when Certificate of Need application is submitted. The public meeting used to scope the ER also satisfies the public comment hearing requirement for the Certificate and Route Permit. Following this first public comment meeting and the completion of the ER, the PUC elects to have either a contested case hearing or an informal and expedited hearing to handle the rest of the permits. [37]

Why:

For states in which overhauling the permitting process to create a new siting authority or eliminating a procedure is infeasible, staging separate permitting processes at the same time, rather than sequentially, can shorten the timeline and reduce the burden on all parties. A pre-application meeting between the developer, state environmental agency and Public Service Commission to determine needs and responsibilities is useful for aligning developer and agency priorities. To facilitate internal coordination, agencies should meet again before initiating the public notice and hearing steps to avoid completing duplicative reviews. Regular post-application meetings between agencies ensures continued coordination.

POLICY RECOMMENDATION 10: Give State Siting Authority Override Power Over Environmental and/or Local Permit Decisions

Example: Michigan

In Michigan, if the Public Service Commission grants the developer a Certificate of Public Convenience and Necessity, such approval takes precedence over any conflicting local ordinance, law, rule, regulation, policy, or practice that prohibits or regulates the location or construction of a transmission line. [38]

Example: Massachusetts

In Massachusetts, if the Office of Energy and Environmental Affairs (MOEEA) denies an environmental permit (Massachusetts requires both a siting and environmental permit), the Siting Board can issue a Certificate of Environmental Impact and Public Interest that overrides the MOEEA decision. The Certificate of Environmental Impact and Public Interest also overrules any local decision obstructing a line. [39]

Why:

In states that require more than one permit for siting, a single agency can delay or unduly obstruct the process. Furthermore, as most states require local approval by a municipal government or zoning board, antagonistic localities are given veto power over lines that may be in the overwhelming interest of the state as a whole. The siting authority can be given the power to issue a permit that overrules the decision of other state or local agencies, whether automatically through their own approval of a siting permit (Michigan) or through a special permit (Massachusetts). In the case of obstructive agencies or local governments, this authority provides a fail-safe to secure the right to build critical lines that the siting authority determines to be in the public interest. This override authority should not be allowed without consideration of public comments in the evidentiary record and designated intervenor opinions (see Policy Recommendations 12 and 14) to ensure localities have sufficient outlets for representation.

POLICY RECOMMENDATION 11: Assign a Hearing Officer to Public Utility Commission Permits

Example: Vermont

In Vermont, a case can be heard by a single Hearing Officer appointed by the PUC and not the PUC itself. [40] The Hearing Officer submits a proposal for decision that then would be reviewed by the PUC which issues the final order.

Why:

Public Utility Commissioners and members of Siting Boards alike suffer from lack of capacity due to competing responsibilities. Assigning a single Hearing Officer to permitting cases can save Commissioners and members the time and energy of attending weeks of hearings and encourages informed decisions through the compilation of relevant evidence by a designated expert in the case.

Policy Goal B: Ensure Public Representation and Consideration

POLICY RECOMMENDATION 12: Consider Public Comments in Permit Decision

Example: New Hampshire, Connecticut, Massachusetts, Rhode Island, Minnesota, Ohio, Illinois, Iowa, New York, New Jersey

In most states, both written and oral public comments are received by the siting authority in a combination of public hearings and online forums. However, only in nine out of the sixteen states of the Northeast-Midwest region do these public comments become part of the evidentiary record upon which the siting authority makes its decision.

Example: Minnesota

In Minnesota, any person may appear at the hearings and offer testimony and exhibits without the necessity of intervening as a formal party to the proceedings. The administrative law judge may allow any person to ask questions of other witnesses. [41]

Example: New York

Only parties to a proceeding may present evidence and examine and cross-examine witnesses. However, “any person may ask the presiding officer for

permission to intervene.” [42] The Commission will grant a petition of intervention if the intervention “is likely to contribute to the development of a complete record or is otherwise fair and in the public interest.” However, in the final decision, the Commission does take into account members of the public who submitted comments electronically, orally, or in writing.

Why:

Accepting public comments but excluding them from consideration in the final permit decision is a perplexing feature of several states’ review processes. In these states, public comment forums are useful only as a space to vent, but have no real impact on the siting authority’s decision. Even in states which actively solicit public comments and enter them into the evidentiary record, consideration of such comments is not guaranteed, as public input can go unread by siting authority members and be dismissed in staff reports. Enshrining public comments in the evidentiary record is the first step to representing community interests in permitting decisions and building community trust in decision-making institutions.

POLICY RECOMMENDATION 13: Provide Accessible and Plain-Language Communications

Example: Vermont

In Vermont, the Public Utility Commission maintains a webpage dedicated to public participation, with downloadable resources that can assist people in participating in its proceedings. [43] For example, it provides “A Citizen’s Guide to the Public Utility Commission,” “Public Participation and Intervention in Proceedings Before the Public Utility Commission,” and “A Guide to Evidentiary Hearings.” Readers can learn about contested and uncontested case proceedings, submitting public comments, and being a formal party to a case. At the bottom of the page, there are quick links to FAQs, an ePUC guidance memo, and contact information for the Clerk of the Commission.”

Why:

Simple, plain-language materials and consistent communication of progress and deadlines build trust and enable productive dialogue between the public, the developer and the siting authority. In addition to the above recommendations from Vermont, sitting authorities can designate staff or hire third parties to translate technical language into layman’s terms. People

also tend to resist what they do not understand. The more accessible a project proposal is, the less likely it is to raise opposition that turns a six-month review into a ten-year slog. Developers can do their part to minimize opposition by providing images of proposed lines and how they impact the landscape, which can assuage the aesthetic concerns of citizens. The 2022 report *Power Play: Actions for New England’s Equitable Energy Transition* includes further recommendations for enhancing the transparency and accessibility of siting processes. [44]

POLICY RECOMMENDATION 14: Designate Intervenor and Intervenor Funding

Example: Michigan

In Michigan, all affected municipalities and landowners are granted full intervenor status in Public Service Commission proceedings, allowing them to participate and comment on proposed major transmission lines. This is especially critical because standard public comments do not enter the evidentiary record. Michigan also has an intervenor compensation program that is funded by the state’s investor-owned utilities based on the number of customers they serve. The program allocates \$750,000 to the Utility Consumer Participation Board to distribute through grants to specific interest groups. The funds are not available to individual applicants. [45]

Why:

Having intervenor status in a permitting case allows affected individuals or groups to make their case at the same status especially in states where standard public comment is not taken into account in the final decision. Acquiring intervenor status in states without support requires the time and resources to hire an attorney and participate in a hearing, which proves a barrier for low-income people. Automatically conveying intervenor status to key parties and compensating intervenors with demonstrated need allows for more democratic participation in hearing processes. An additional step to ensure representation of affected communities is to have a designated Environmental Justice intervenor in all cases. *Power Play: Actions for New England’s Equitable Energy Transition* recommends that permitting authorities “develop lists of affected stakeholders, including those that are underrepresented, and reach out to them” when an application is submitted.

POLICY RECOMMENDATION 15: Require Municipality Recommendations

Example: Connecticut

In Connecticut, at least 60 days prior to the filing of an Application, the developer must consult with the chief executives of every municipality in which the project may be located to discuss the project, including technical reports concerning the public need, the site selection process, and the environmental effects of the proposed facility. [46] The municipality may conduct public hearings and use them to inform its recommendations that it must issue to the developer within 60 days of the initial meeting.

Why:

This step provides a forum for public participation and encourages the consolidation of individual qualms into concerns relevant to the larger population. Furthermore, by consulting with municipalities early in the process, the developer can mitigate the delay caused by public opposition by preemptively addressing concerns.

POLICY RECOMMENDATION 16: Require Developer to Fund Impact Studies for Municipalities

Example: Rhode Island

In Rhode Island, impacted cities and towns may request funding from the developer to perform studies on local environmental impacts of the proposed project. [47] The cost of these studies must not exceed the lesser of \$100,000 or 0.1% of the estimated cost of the proposed facility located within the requesting city or town. Upon the request of the municipality, the developer may request a ruling from the Siting Board to determine whether requested studies are necessary and “reasonably expected to produce relevant information.” The siting board holds a hearing and issues a final decision on whether the impact study is necessary and determines the cost.

Why:

Municipalities may lack the resources to accurately measure the impact of a transmission line on their constituents, which can cause local concerns to over-inflate or under-assess the danger of a project. They also should not have to bear the burden of funding a study for a project that may or may not come to fruition. Conducting impact studies increases transparency and trust between the developer and impacted localities.

Conclusion



The need for renewable energy is uncontestable. The technology is here. The facilities are ready. But fields of solar panels and farms of wind turbines lie still and silent, unconnected to the electrical grid that grows more brittle and congested every day. The single greatest barrier to utility-scale renewable energy deployment is lack of high-voltage, long-range transmission lines. And the single greatest barrier to the buildout of these transmission lines is the permitting process.

Permitting is at the heart of decarbonization. Without changing these procedures, the electricity we need to live daily and live sustainably will never reach our homes. With the power afforded by federalism, states have the responsibility and capability to overhaul and align their permitting procedures to deliver clean electricity and protect their constituents from blackouts and climate change. While incompatibility of state permitting processes has been a curse on rapid transmission deployment, the diversity in procedures is also a blessing: in the 18 states of the Northeast-Midwest, we find 18 case studies to learn from, 18 definitions of an expedited review, 18 opportunities to facilitate conversation between developers and the public.

Examining the siting authority structure, public comment and intervenor status, and the distribution of permits illuminates opportunities to consolidate responsibilities and requirements. Creating expedited review options for lines in existing right-of-ways and designated energy infrastructure corridors and lines necessary to meet greenhouse gas reduction goals is a critical next step towards prioritizing the decarbonization needs of the moment.

We also need to rethink public participation in the siting process. Recent transmission development cases such as the New England Clean Energy Connect line in Maine present public participation as antithetical to project success. Providing accessible information and embedding two-way conversations between the public, developers, and agencies into the permitting process go a long way in building the trust that invites a community to welcome, rather than obstruct, a transmission project. And these macro-level changes do not eliminate the impact of simple fixes that can save months: hiring more staff, digitizing information and application submissions, and holding regular meetings will empower agencies to act with both speed and diligence. Now is the time for state legislators to come together and enact concrete reforms to streamline state permitting processes and secure a reliable and sustainable future.



Opportunities for Further Study

The lack of action on state permitting reform is due in large part to a lack of scholarly research. Simply put, until recently, no one has been interested in what individual states can do to speed up the transmission permitting process. Research for this report has relied on the primary sources of state statutes for information and ideas, rather than past studies. This report compiles information on the current permitting process steps for 18 states and draws on differences in those established procedures to offer suggestions for other states. It also applies expert recommendations for public service commissions in general to state transmission permitting. Future reports could expand the study to all 50 states. Furthermore, due to time constraints, this report did not examine the results of these different permitting processes to see if there is a link between the use of certain procedures and a faster or less contentious timeline. The recommendations listed are ideas rather than proven strategies. A future report could go through the dockets of all high-voltage transmission permit applications in the Northeast and Midwest and track the time between steps of the process as well as document points raised by project opponents to see if there are trends.

To expand upon this report, researchers could inventory proposed state-level legislation in the National Conference of State Legislatures' Energy Legislation Database to assess the landscape of new ideas in permitting. Researchers could also examine if there is a link between existing and proposed permitting procedures and political leanings of states. Further study could examine permitting procedures in countries with similar regulatory frameworks to the United States to identify processes that could be easily translated to our federalist structure. Recommendations can also be innovated and not taken directly from existing procedures. Further study could target countries with vastly different governance and public participation structures to expand paradigms about what is feasible and functional.

Examining non-regulatory avenues for transmission buildout is also promising. Future researchers could dive into Texas's Competitive Renewable Energy Zones initiative, which pre-approve corridors for transmission development, to discover how such a mechanism could be applied in the Northeast and Midwest.

In addition to the Policy Recommendations for permitting reform within states outlined in this report, standardizing procedures across states, through establishing regionally-agreed upon permitting requirements, authoring Memorandums of Understanding, and building information-sharing platforms, will be critical to ensuring that best practices do not end at a state border. Further research could identify vehicles for cross-state standardization of procedures, sharing of information, and collaboration.

Finally, recent studies have proposed that distributed energy resources such as rooftop solar could provide an avenue to decarbonization that does not rely on the expansion of our electrical grid but rather a localization of resources that reduces the need for transporting energy long distances. This path would substantially reduce the need for the high-voltage transmission lines discussed in this report. Future study should examine the tradeoffs between a central power station grid using high-voltage lines and a distributed energy landscape to consider whether one path is more feasible and expeditious than the other and explore opportunities for mixed approaches.

Special thanks to Alex Eastman and Dr. Micheal Goff for their guidance and support in the making of this report.

Sources

1. “FOTW #1304, August 21, 2023: In 2023, Non-Fossil Fuel Sources Will Account for 86% of New Electric Utility Generation Capacity in the United States.” US Department of Energy, 21 August 2023, <https://www.energy.gov/eere/vehicles/articles/fotw-1304-august-21-2023-2023-non-fossil-fuel-sources-will-account-86-new>. Accessed 28 April 2024.
2. “Doe Launches New Initiative from President Biden’s Bipartisan Infrastructure Law to Modernize National Grid.” US Department of Energy, January 2022, www.energy.gov/oe/articles/doe-launches-new-initiative-president-bidens-bipartisan-infrastructure-law-modernize. Accessed 03 June 2024.
3. “Winter Storm Power Outage Series.” The Texas Tribune, 2021, <https://www.texastribune.org/series/winter-storm-power-outage/>. Accessed 2 June 2024.
4. Pyle, Thomas. “Transmission Permitting Is Broken.” American Energy Alliance, 7 Dec. 2022, www.americanenergyalliance.org/2022/12/transmission-permitting-is-broken/. Accessed 02 June 2024.
5. Zullo, Robert. “Building Transmission Takes Forever. The Biden Administration Is Pushing to Change That.” Missouri Independent, 19 Dec. 2023, missouriindependent.com/2023/12/19/building-transmission-takes-forever-the-biden-administration-is-pushing-to-change-that/. Accessed 02 June 2024.
6. Moore, Emily. “Is the Permitting Process for Transmission Lines Really Broken?” Sightline Institute, 9 Nov. 2023, www.sightline.org/2023/11/09/is-the-permitting-process-for-transmission-lines-really-broken/. Accessed 02 June 2024.
7. “Electricity Transmission Permitting Reform Proposals.” Congressional Research Service, May 2024, crsreports.congress.gov/product/pdf/R/R47627#:~:text=Much%20congressional%20interest%20in%20electricity,transmission%2Drelated%20issues%20and%20processes. Accessed 03 June 2024.
8. “Manchin Moves Ball Forward on Permitting Reform.” U.S. Senate Committee on Energy and Natural Resources, 2 May 2023, www.energy.senate.gov/2023/5/manchin-moves-ball-forward-on-permitting-reform. Accessed 02 June 2024.

9. Jay Landers, et al. “Policy Briefing: FERC Takes Aim at Electric Generation Interconnection Backlog.” ASCE American Society of Civil Engineers, Sept. 2023, www.asce.org/publications-and-news/civil-engineering-source/civil-engineering-magazine/article/2023/09/ferc-takes-aim-at-electric-generation-interconnection-backlog. Accessed 02 June 2024.
10. Slanger, Dan. “Going the Distance on Interconnection Queue Reform.” Rocky Mountain Institute, 3 Aug. 2023, rmi.org/going-the-distance-on-interconnection-queue-reform/. Accessed 02 June 2024.
11. “Massachusetts Transmission Siting.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/Roadmap/8-MA-a>. Accessed 28 April 2024
12. “How to Participate | MPUC.” Maine.gov, Maine Public Utilities Commission, 2021, <https://www.maine.gov/mpuc/about/how-to-participate>. Accessed 28 April 2024.
13. “Michigan Certificate of Public Convenience and Necessity.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/Roadmap/8-MI-c>. Accessed 28 April 2024.
14. “State of Minnesota Office of Administrative Hearings Order for the Public Utilities Commission.” Minnesota.gov, 2010, https://mn.gov/oah/assets/250020995%20Not.%20of%20PHC%20bjh_tcm19-163664.pdf.
15. “Maine Bulk Transmission Siting & Permitting.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/BulkTransmission/Maine>.
16. “Bulk Transmission Siting & Permitting.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/BulkTransmission/Jurisdictions>.
17. “Rhode Island Bulk Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, https://openei.org/wiki/RAPID/BulkTransmission/Rhode_Island/Transmission.
18. “New York Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, https://openei.org/wiki/RAPID/BulkTransmission/New_York/Transmission.

19. Steven C. Russo, Jane McLaughlin. “New York State Proposes ‘rapid Act’ and Other Bill to Aid in Transition to Renewable Energy and Away from Natural Gas.” E2 Law Blog, 9 Feb. 2024, www.gtlaw-environmentalandenergy.com/2024/02/articles/state-local/new-york/new-york-state-proposes-rapid-act-and-other-bill-to-aid-in-transition-to-renewable-energy-and-away-from-natural-gas/. Accessed 02 June 2024.
20. “Recommendations to Governor Maura Healey on Clean Energy Infrastructure Siting and Permitting Reform. “Commonwealth of Massachusetts - Commission on Energy Infrastructure Siting and Permitting,” 12. Mass.gov, 29 March 2024, <https://www.mass.gov/doc/recommendations-to-governor-maura-healey-on-clean-energy-infrastructure-siting-and-permitting-reform/download>. Accessed 28 April 2024.
21. Ibid, 13.
22. Ibid, 10-15.
23. “Rhode Island Bulk Transmission Siting & Regulation,” National Renewable Energy Laboratory.
24. “About the Energy Facilities Siting Board (EFSB) Members.” Mass.gov, 2024, <https://www.mass.gov/info-details/energy-facilities-siting-board-efsb-members>. Accessed 28 April 2024.
25. “Maine Certificate of Public Convenience and Necessity.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020.
26. “Title 35-A, §103-A: Climate requirements.” Maine Legislature, 2021, <https://legislature.maine.gov/statutes/35-A/title35-Asec103-A.html>. Accessed 18 April 2024.
27. “Ohio Bulk Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020. <https://openei.org/wiki/RAPID/BulkTransmission/Ohio/Transmission>. Accessed 20 April 2024.
28. “Wisconsin Bulk Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/BulkTransmission/Wisconsin/Transmission>.
29. Trabish, Herman K. “Transmission Troubles? A Solution Could Be Lying along Rail Lines and Next Generation Highways.” Utility Dive, 12 Nov. 2020, www.utilitydive.com/news/transmission-troubles-a-solution-could-be-lying-along-rail-lines-and-next/587703/. Accessed 02 June 2024.

30. “Transmission & CREZ Fact Sheet.” Power Up Texas, 2 December 2018, <https://www.poweruptexas.org/wp-content/uploads/2018/12/Transmission-and-CREZ-Fact-Sheet.pdf>. Accessed 28 April 2024.
31. Permit Navigator, Department of Environmental Conservation, dec.vermont.gov/permitnavigator.
32. “Rhode Island Bulk Transmission Siting & Regulation,” National Renewable Energy Laboratory.
33. “Recommendations to Governor Maura Healey on Clean Energy Infrastructure Siting and Permitting Reform,” 13.
34. US Department of Energy. “Transmission Siting and Economic Development Grants Program.” Department of Energy, 2023, <https://www.energy.gov/gdo/transmission-siting-and-economic-development-grants-program>. Accessed 28 April 2024.
35. “Recommendations to Governor Maura Healey on Clean Energy Infrastructure Siting and Permitting Reform,” 13.
36. “Wisconsin Bulk Transmission Siting & Regulation,” National Renewable Energy Laboratory.
37. “Minnesota Bulk Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/BulkTransmission/Minnesota/Transmission>.
38. “Michigan State Legislature Act 30 of 1995.” Michigan Legislature, legislature.mi.gov/Laws/MCL?objectName=MCL-ACT-30-OF-1995. Accessed 0 June 2024.
39. “Massachusetts Transmission Siting,” National Renewable Energy Laboratory.
40. “Vermont Bulk Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, [https://openei.org/wiki/RAPID/Roadmap/8-VT-c\(1\)](https://openei.org/wiki/RAPID/Roadmap/8-VT-c(1)).
41. “State of Minnesota Office of Administrative Hearings Order for the Public Utilities Commission,” Minnesota.gov.
42. “New York Transmission Siting & Regulation,” National Renewable Energy Laboratory.
43. Department of Environmental Conservation. “Permits, Licenses and Certifications.” Vermont Department of Environmental Conservation, 2024, <https://dec.vermont.gov/permits>. Accessed 28 April 2024.

44. Brown Climate & Development Lab, et al. “Power Play: Actions for New England’s Equitable Energy Transition.” Climable, March 2023, <https://static1.squarespace.com/static/542b0d79e4b0a8c50e8b52a0/t/6407616c95a9ee2d64fabb8a/1678205292655/Power-Play-Report-07-03-2023.pdf>. Accessed 3 April 2024.
45. “State Approaches to Intervenor Compensation.” Michigan.Gov, National Association of Regulatory Utility Commissioners, Dec. 2021, www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/workgroups/eaac/NA_RUC_State_Approaches_to_Intervenor_Compentation.pdf?rev=f2ba93a5a8c64e27b3c2bf7425158906&hash=5CF9DDF32D9ADCD72389A572D9EDD690.
46. “Connecticut Bulk Transmission Siting & Regulation.” Regulatory and Permitting Information Desktop Toolkit, National Renewable Energy Laboratory, 2020, <https://openei.org/wiki/RAPID/Roadmap/8-CT-a>.
47. “Rhode Island Bulk Transmission Siting & Regulation,” National Renewable Energy Laboratory.

About the Northeast-Midwest Institute

The Northeast-Midwest Institute is a nonprofit, nonpartisan research, education, and policy organization based in the nation's capital. Our mission is to promote economic vitality, environmental quality, and regional equity for the 18 Northeastern and Midwestern states: Connecticut, Delaware, Illinois, Indiana, Iowa, Maine, Maryland, Massachusetts, Michigan, Minnesota, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, and Wisconsin.

Since our formation in the mid-1970s, we have carried out this mission through conducting research and analysis, developing and advancing innovative policy, evaluating key federal programs, disseminating information, and highlighting sound economic and environmental technologies and practices. Working in concert with our sister organizations, the Northeast-Midwest Congressional Coalition and the Northeast-Midwest Senate Coalition, the Institute partners with public officials and community leaders to address some of the most pressing problems facing the region. We implement issue-based programs that seek solutions applicable to all 18 states, e.g. contaminated sites, water pollution, sprawl, and place-based programs that focus on specific vital resources within the region, e.g. the Great Lakes, Chesapeake Bay.

Contact Us



For Permitting Report Inquiries:

eva_kappas@brown.edu

For General Inquiries:

info@nemw.org



<https://www.nemw.org/>

