November 21, 2025

The Honorable Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

**RE: Accelerating Speed to Power/Winning the Artificial Intelligence Race: Federal Action to Rapidly Expand Grid Capacity and Enable Electricity Demand Growth.**

Dear Secretary Wright,

Citizens for Responsible Energy Solutions (CRES) is a 501(c)(4) non-profit organization founded in 2013 to engage Republican policymakers and the public about responsible, conservative solutions to address our nation's energy, economic and environmental security while increasing America's competitive edge. CRES advocates for the advancement and deployment of cutting-edge clean energy technologies with the goal of both reducing emissions while ensuring reliable and affordable energy. We appreciate the opportunity to comment on the Department of Energy (DOE) request for information related to the Speed to Power Initiative.

Sustained U.S. global leadership in artificial intelligence (AI) depends on maintaining an abundant foundation of energy leadership.[1] As the Administration's *AI Action Plan* highlights, the nations that deliver gigawatt-scale electricity fastest will host the infrastructure defining the future economy.[2] The Speed to Power Initiative can help America maintain its leadership by ensuring electricity stays affordable, reliable and abundant.

## Q1. Large-Scale Generation and Transmission Projects to Enable Load Growth

CRES believes private-sector developers are best suited to highlight the most efficient and economically viable projects, therefore we do not identify specific projects for DOE consideration. However, DOE can accelerate progress by prioritizing project types that provide large, immediate benefits. We believe the department can add the most value by prioritizing project categories that deliver near-term, system-wide reliability benefits, support large-load interconnections and complement private investment. DOE should focus on four priority areas to accelerate reliable, affordable power:

- **Upgrade existing assets**: Repower or uprate power facilities for rapid gigawatt-scale reliability gains, leveraging existing infrastructure and workforces.

[1] Citizens for Responsible Energy Solutions Forum. (2025, January 15). *The promise of AI in energy: Unlocking energy independence and ensuring national security.* https://cresforum.org/publications/the-promise-of-ai-in-energy-unlocking-energy-independence-and-ensuring-national-security/
[2] The White House. (2025, July 10). *America's AI action plan*. https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf

- **Modernize transmission corridors**: Encourage the deployment of high capacity reconductoring. This could double transfer capability without new rights-of-way.
- **Deploy grid enhancing technologies (GETs)**: Support technologies that maximize the efficiency and capacity of existing transmission infrastructure, including dynamic line rating, advanced power flow control devices and grid-scale storage.
- **Integrate storage and grid-stability resources**: Deploy batteries, synchronous condensers and advanced power electronics to stabilize regions with variable loads and renewables.

These priorities would expand and upgrade existing assets, remove bottlenecks in the current system and enable developers to meet the nation's demand for reliable, affordable power.

## Q2. High-Priority Geographic Areas for Targeted DOE Investment

No response.

## Q3. Use of DOE Funding, Financing, and Technical Assistance

CRES believes DOE can provide the highest-value contribution by reducing early-stage risk, improving investment certainty and coordinating interagency processes to ensure projects move from concept to construction on predictable timelines.

### *Financial Tools to De-Risk Private Capital*

DOE should leverage a full suite of federal tools and authorities—including grants, loan guarantees and tax incentives—to accelerate projects that deliver affordability, reliability and emissions reductions. The functions of the Loan Programs Office, Transmission Facilitation Program and Grid Resilience and Innovation Partnerships are particularly powerful tools to de-risk and deploy innovative new technologies. Conditional commitments and loan guarantees through the Loan Programs Office can bridge early-stage financing gaps without distorting markets, as demonstrated by the Palisades Nuclear Plant restart and American Electric Power's 5,000-mile reconductoring initiative.[3] These mechanisms should be used to accelerate market investment, not replace it.

DOE should structure all funding and financing programs to be technology-neutral, performance-based and regionally flexible. Funding decisions should prioritize affordability, reliability and flexibility in a clear, consistent manner. Environmental attributes should also be considered to promote the competitiveness of American products in international and domestic markets with high environmental standards. By using these criteria, DOE can ensure that federal capital is available to ensure we meet our energy deployment goals.

[3] Department of Energy. (2025, September 16). *DOE approves sixth loan disbursement to restart Palisades nuclear plant.* https://www.energy.gov/articles/doe-approves-sixth-loan-disbursement-restart-palisades-nuclear-plant;
Department of Energy. (2025, October 16). *Energy Department closes loan guarantee to strengthen U.S. grid reliability.* https://www.energy.gov/articles/energy-department-closes-loan-guarantee-strengthen-us-grid-reliability

### *Streamlining Permitting and Federal Coordination*

Permitting timelines remain one of the largest barriers to grid expansion. Despite recent reforms cutting the median time to complete an Environmental Impact Statement (EIS) from 3.6 years to 2.2 years.[4] Timelines remain unpredictable as multiple agencies conduct sequential and uncoordinated reviews that delay otherwise ready projects. This fragmented process increases costs, discourages private investment and deters deployment.

CRES supports concurrent reviews of projects to reduce project delays while maintaining environmental integrity. Additionally, DOE should strengthen coordination with other key agencies to harmonize policies affecting grid expansion. Interagency Memoranda of Understandings could define clear roles, timelines and shared datasets.

### *Strengthening Technical Assistance*

Technical assistance helps reduce project uncertainty by providing resources like standardized interconnection modeling assumptions, grid integration studies for inverter-based resources and assessments of transformer and equipment supply constraints.[5] Continuing to provide technical assistance to relevant stakeholders like grid operators, utilities and developers should be of highest priority to the DOE.

## Q4. Load Growth Trends

Projections show that data centers, advanced manufacturing and electrification are the primary drivers of unprecedented near-term electricity demand growth.[6] A recent report by Deloitte projects that peak electric demand in the U.S. could grow up to 26 percent by 2035.[7] These trends underscore a broader reality highlighted by recent federal assessments: America will need to rapidly deploy significant new load-serving capacity to uphold grid reliability while meeting surging AI and industrial demand. The regions that can bring new energy infrastructure online quickly, affordably and reliably will anchor the next generation of U.S. economic leadership and prosperity.

## Q5. Grid Infrastructure Constraints

Regulatory complexity, not technology limitations, is a primary barrier that is preventing America from meeting surging electricity demand. In July, the Department published a resource adequacy report title *Evaluating the Reliability and Security of the United States Electric Grid*, which highlighted that permitting timelines, serial and uncoordinated reviews and fragmented siting processes threaten the timely availability of essential load-serving resources.[8] These delays

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[4] Council on Environmental Quality. (n.d.). *Environmental impact statement (EIS) timelines.* https://ceq.doe.gov/nepa-practice/eis-timelines.html
[5] National Renewable Energy Laboratory. (n.d.). *Utility and grid operator technical assistance.* https://www.nrel.gov/state-local-tribal/utility-grid-operator-technical-assistance
[6] Grid Strategies LLC. (2024, December). *National load growth report 2024.* https://gridstrategiesllc.com/wp-content/uploads/National-Load-Growth-Report-2024.pdf
[7] Keefe, T., Hardin, K., & Nagdeo, J. (2025, October 29). *2026 Power and Utilities Industry Outlook*. Deloitte Insights. https://www.deloitte.com/us/en/insights/industry/power-and-utilities/power-and-utilities-industry-outlook.html
[8] Department of Energy. (2025, July 7). *Department of Energy releases report evaluating U.S. grid reliability and security.* https://www.energy.gov/articles/department-energy-releases-report-evaluating-us-grid-reliability-and-security

raise capital costs, lengthen project development cycles and weaken the nation's ability to bring new generation online at the pace required to support advanced computing and manufacturing.

Interconnection backlogs pose an additional challenge. DOE can help alleviate these challenges by supporting studies that evaluate multiple projects simultaneously. Prioritizing projects based on readiness and speed to deployment rather than queue position can expedite projects for interconnection into the bulk power supply.

In addition to regulatory reform and interconnection improvements, DOE should promote the deployment of GETs (i.e., dynamic line rating, advanced power flow control, storage solutions, etc.) as practical tools to alleviate transmission constraints. These technologies can unlock latent capacity on existing lines, expedite project timelines and reduce the need for major new builds, helping to efficiently meet surging demand.

The rapid buildout of extra-high-voltage (EHV) transmission can create room for new load and supply, which would enable interconnections to occur at scale and speed. By expanding EHV corridors the nation can relieve congestion, reduce curtailment and allow fully studied projects to move forward more predictably without heavy-handed federal intervention.

While regulatory reform is central, federal strategy documents also stress the importance of strengthening the skilled workforce needed to build new energy infrastructure. America will not meet rising demand without expanding the pipeline of electricians, linemen, power plant operators and high-voltage technicians required to deliver these projects. Supporting industry-led training partnerships and modernizing workforce pathways aligns with the Administration's focus on rebuilding American industrial capacity and ensuring the country can deploy critical energy and manufacturing assets at scale.

These reforms—streamlined permitting, modernized interconnection processes and a strengthened energy workforce—would accelerate deployment across all technologies without favoring any resource type, advancing reliability and affordability through competitive markets.

**Conclusion**

America's ability to harness growing electricity demand is a generational economic opportunity. With predictable policies and streamlined processes, the United States can accelerate deployment, attract investment, maintain technological leadership and secure energy dominance.

Sincerely,

Heather Reams
President and CEO
Citizens for Responsible Energy Solutions