

From: Cora Hoffer <corah@cfra.org>
Sent: Tuesday, April 15, 2025 12:00 PM
To: NIETC
Cc: Lu Nelsen
Subject: [EXTERNAL] DOE-HQ-2024-0088-Tribal Energy Access Corridor-Center for Rural Affairs
Attachments: DOE-HQ-2024-0088-Tribal Energy Access Corridor-Center for Rural Affairs.pdf

Good afternoon,
Please accept this comment from the Center for Rural Affairs in response to the Tribal Energy Access Corridor (DOE-HQ-2024-0088) being proposed as a potential NIETC.

Respectfully,
Cora Hoffer

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April 15, 2025

U.S. Department of Energy
Grid Deployment Office
1000 Independence Ave. SW, Suite 4H-065
Washington, DC 20585

RE: DOE-HQ-2024-0088, Tribal Energy Access Corridor

To whom it may concern,

The Center for Rural Affairs is a private non-profit organization that advocates for policies that strengthen rural communities in order to create a more vibrant future. We connect rural citizens with opportunities to engage in the decisions that affect their lives, including the impact of energy development on their communities.

The Tribal Energy Access Corridor is an important addition to the North Dakota, South Dakota, and Nebraska transmission system, and the regional electric grid. This area was selected as a potential National Interest Electric Transmission Corridor (NIETC), an area where inadequate transmission harms consumers. A NIETC designation in this region will help enable infrastructure development that will alleviate congestion, support integration of new energy resources, and reduce consumer costs.

Benefits of Transmission Expansion

Renewable energy has grown into a thriving industry in the Upper Midwest and Great Plains, especially wind energy. Wind energy has proven beneficial to rural communities by providing new employment opportunities for rural communities, a vital source of tax revenue for counties, and an additional source of income for many farmers and ranchers.

The Upper Midwest and Great Plains offer great potential opportunities for wind growth. According to the Department of Energy's Wind Energy Technologies Office, in the first quarter of 2024, Nebraska had 3,519 megawatts (MW) of installed wind energy capacity, and 465 MW of potential wind capacity. In the same time period, South Dakota had 3,462 MW of installed wind capacity and 418 MW potential capacity, and North Dakota had 3,665 MW of installed wind capacity and 296 MW potential wind capacity. To harness the potential growth across this region, it's critical that there is available transmission capacity to connect low-cost renewable energy resources to consumers.

Communities and landowners that wish to take advantage of local renewable energy resources face several challenges, and lack of electric transmission infrastructure is a difficult barrier to remove. Reliable transmission for renewable energy is a necessity for development, as it allows power to move across the larger grid and reach more communities. The electric transmission network was not designed to reach lightly populated areas of the Midwest and Great Plains that



have strong wind energy potential. Intentional transmission planning is key to identify system needs and determine strategic investments that can address shortfalls in the transmission system, including interconnection capacity for new electric generation and upgrades that can increase reliability of electric service.

Expanding and improving the electric grid is a positive step towards improving service reliability for rural homes and businesses, which can reduce the impact of extreme weather on electric services and lower incidents of power outages in rural areas. The guarantee of reliable electricity is often one of the deciding factors for proposed economic development in rural areas, as is access to nearby generating resources to reduce the risk of long-term outages and improve overall resiliency. Modernizing the transmission system is ultimately an investment in new economic development for many rural communities, enabling the development of new renewable energy generation that provides direct benefits to citizens and ensuring a reliable connection to electricity for existing and potential new businesses.

Recommendations

Community Engagement

Robust community engagement is critical to the success of infrastructure projects. It is important to consider the insight of local stakeholders and to provide opportunities for these stakeholders to share information about proposed project areas outside of the hearings or comment periods. These opportunities help to build relationships between the project developer and stakeholders, and can ultimately improve the design and development process for transmission projects. The interests of local stakeholders can be used to identify unique characteristics and circumstances that should be considered as part of the project, and can reduce long-term negative outcomes.

Environmental and Cultural Impacts

Insights from local stakeholders will help reduce impacts to environmental and cultural resources during the construction process. Working with experts on mitigation measures is essential to ensure that the construction process will not cause lasting damage to the environment and the local area. During construction, it is also important to seek out techniques that will assist in restoring the unique environment of the proposed NIETC region, in addition to working with landowners to determine which technique would work best for their property.

Post-construction restoration should extend beyond simply fixing damage to soil and vegetation, aiming instead to restore the local landscape to its previous condition and to the satisfaction of landowners. Beyond environmental impacts, also consider the impact of heavy equipment traffic on local roads throughout the area. Working with local communities and counties to form agreements to account for any potential damage to roadways may help mitigate concerns.

Additionally, collaboration with stakeholders and communities is a necessary step to avoiding damage to sensitive cultural sites and resources throughout the construction process. Due to



the proposed route for the Tribal Access Energy Corridor, it is key that there is an intentional effort to work with community members and tribal governments to identify unique cultural areas to avoid, and steps that can be taken to protect these areas throughout the development of new transmission.

Conclusion

The electric transmission network was not designed to reach lightly populated areas of the Midwest and Great Plains that have strong wind energy potential. Updates to the transmission network will increase access to new electric generating capacity in these regions, and improve reliability of service for rural consumers. Designating the Tribal Energy Access Corridor as a NIETC is a positive step towards encouraging critical infrastructure development that will increase renewable energy development and improve grid reliability and resiliency in a region rich with energy potential.

Thank you for the opportunity to comment on the proposed corridor, and taking the time to consider our comments and considerations.

Respectfully submitted,

Cora Hoffer
Senior Policy Associate
Center for Rural Affairs