

June 2, 2022

The Honorable Patricia A. Hoffman
Acting Assistant Secretary,
Office of Electricity
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Acting Assistant Secretary Hoffman:

This letter is in response to the Department of Energy’s (DOE) Request for Information (RFI) on “Formula Grants to States and Indian Tribes for Preventing Outages and Enhancing the Resilience of the Electric Grid”, noticed on May 3, 2022. DOE’s RFI requests feedback on challenges faced by eligible entities in preparing applications, and technical assistance which would be helpful to applicants. While the American Society of Civil Engineers (ASCE) applauds DOE’s efforts to engage eligible stakeholders in facilitating an effective application process, ASCE is concerned over the lack of ability for other stakeholders to provide feedback on the program’s overall structure and focus.

Section 40101 (d) of the Infrastructure Investment and Jobs Act (IIJA)- Preventing Outages and Enhancing the Resilience of the Electric Grid- Grants to States and Indian Tribes- authorizes the Secretary of Energy to make grants available to states and tribes for grid resilience and modernization projects based on population, probability of disruptive events, and major disasters or emergencies declared by the President, among other criteria. While we understand DOE’s engagement of entities which would be eligible for these grant funds, and the efficacy of seeking input from such entities on ways to improve application and allocation processes, we are concerned that the RFI fails to adequately engage stakeholders, such as those in the civil engineering community, on how grant funds can best be utilized to select projects which will have a significant impact on grid resilience.

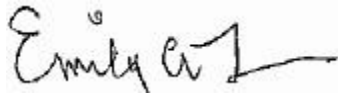
The program outlined in Section 40101 (d) is broadly focused on modernizing the existing electric grid through investment at the state and tribal level. The challenge this poses is that the power grid stretches nationwide and does not recognize borders or tribal alignments. If grant funding is not well focused on systems and types of projects, we believe the impact on resiliency and modernization will be limited.

In order to address these concerns, when awarding grants to states and tribes, DOE should give priority to projects which will enhance overall grid resilience. Such projects include, but are not limited to:

- Enhancing the interconnectedness of the Eastern, Western, and Texas power grids;
- Providing pathways and associated permitting for key transmission lines effectively introducing clean energy or adding new infrastructure;
- Storm hardening programs which will replace our significantly aging infrastructure and make vastly needed improvements to grid reliability and resiliency;
- Use of consensus-based standards (i.e.. ASCE Standards and Practices) that will ensure that newly built overhead line infrastructure can withstand the effects of climate change and other weather-related events;
- Advancing hardware such as next-evolution reclosers, fault indicators, and switches;
- Effectively managing vegetation and animal life, which are significant sources of distribution outages;
- Enhancing the physical and cyber security of major substations, which recent events have shown is essential to protecting critical infrastructure; and
- Improvements to load flow and loss reduction, including expanded use of DC transmission, where appropriate.

We appreciate DOE's consideration of ASCE's concerns regarding implementation of section 40101 (d) of IIJA. ASCE is eager to serve as a resource to DOE in implementation of further IIJA priorities which strengthen the nation's power grid, enhance resilience, and improve the availability and reliability of service to consumers. If you have further questions, please contact Matthew McGinn with our Government Relations team (mmcginn@asce.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Feenstra". The signature is written in a cursive style with a long horizontal flourish at the end.

Emily Feenstra
Chief Policy & External Affairs Officer
American Society of Civil Engineers