



N A R U C  
National Association of Regulatory Utility Commissioners

August 8, 2018

Mr. Francis Brooke  
Special Assistant to the President, Domestic Energy and Environmental Policy  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

RE: *Locating Qualified Candidates for Policy Positions in the Trump Administration*

Mr. Brooke,

One issue faced by all Administrations is identifying qualified candidates who understand the issues and can hit the ground running.

My association, the National Association of Regulatory Utility Commissioners (NARUC), can help.

For more than 130 years, public utility commissions from every state, the District of Columbia, and all U.S. territories, have led the way in developing and implementing novel policies to promote the efficient and affordable deployment of utility services in energy, water, and telecommunications services. Because of its members' expanse of expertise and practical experience, NARUC is a valuable resource the Administration should tap when addressing the network industries critical to the continued growth of the American economy.

This, and prior Administrations, have consistently recognized the logic of assuring a State Commission view point at the Federal Energy Regulatory Commission (FERC), the Nuclear Regulatory Commission, the Federal Communications Commission and the U.S Department of Energy. Indeed, 12 of the last 22 commissioners appointed to FERC were State Commissioners. At our summer policy summit, NARUC unanimously passed a *Resolution Urging the Administration to Appoint State Commissioners to Open Vacancies at FERC and Other Federal Agencies*.

As that Resolution points out:

*No one* understands better than state commissioners the real-world, often unintended, effects of federal policy at the ground level on consumers, and how such policies complement, interfere, or interact with related state programs or local/regional market conditions/demographics;

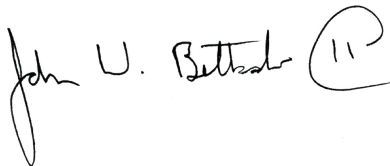
State commissioners live at the leading edge of energy policy formation with programs that frequently are templates for novel federal regulatory and deregulatory initiatives; and

State commissioners are well positioned to help any administration fine tune policy to maximize opportunities in any critical infrastructure sector, as well as address interdependencies, synergies, and security concerns that involve the other critical infrastructures subject to their oversight.

NARUC appreciates this Administrations' incorporation of talented former State commissioners into key positions at the NRC, the FERC and the Department of Energy. We respectfully request that President Trump continue to appoint individuals with service experience as state commissioners to vacancies on the FERC and to related posts in other federal agencies to assure that the Administration's policies can benefit from state commissioners' recognized practical experience, as well as seize opportunities for federal and state cooperation, and ensure that federal agency decisions consider the impact of federal decision-making all the way down to consumers in the states.

We know how busy you are, but NARUC would appreciate it if you could find some time on your calendar for a brief meeting with our Executive Director Greg White. In any case, if you have any questions about NARUC's members or we can be of any other assistance, please do not hesitate to contact Mr. White at 202.898.2208 or [gwhite@naruc.org](mailto:gwhite@naruc.org).

Sincerely,

A handwritten signature in black ink that reads "John U. Betkoski III". The signature is written in a cursive style with a large, stylized initial "J". To the right of the name, there is a small circular mark containing the number "11".

John Betkoski III  
NARUC President

## Appendix A

### ***Resolution Urging the Administration to Appoint State Commissioners to Open Vacancies at FERC and other Federal Agencies***

*Whereas* for more than 130 years, public utility commissions from every state, the District of Columbia, and all U.S. territories, have led the way in developing and implementing novel policies to promote the efficient and affordable deployment of utility services in all sectors;

*Whereas* more often than not, state commissions have implemented policies that have been the prototype for cutting-edge congressional or federal agency initiatives;

*Whereas* no one understands better than state commissioners the real-world, often unintended, effects of federal policy at the ground level on consumers, and how such policies complement, interfere, or interact with related state programs or local/regional market conditions/demographics;

*Whereas* energy is a primary economic driver for the U.S. economy and state commissioners oversee the operations of the country's gas, electric, water, and telecommunications systems at the ground level;

*Whereas* state commissioners live at the leading edge of energy policy formation;

*Whereas* past administrations and this one have recognized the advantages of appointing current and former state utility commissioners for service on the Federal Energy Regulatory Commission, the Federal Communications Commission, the Nuclear Regulatory Commission, and in the U.S. Department of Energy;

*Whereas* state commissioners are well positioned to help any administration fine tune policy to maximize opportunities in that sector - as well as address interdependencies, synergies, and security concerns that involve the other critical infrastructures subject to their oversight;

*Resolved* that the Board of Directors of the National Association of Regulatory Utility Commissioners, convened at its 2018 Summer Policy Summit in Scottsdale, Arizona, respectfully request that current and future administrations appoint individuals with service experience as state commissioners to vacancies on the Federal Energy Regulatory Commission and to related posts in other federal agencies to assure that the administration's policies can benefit from state commissioners' recognized practical experience, as well as seize opportunities for federal and state cooperation, and ensure that federal agency decisions consider the impact of federal decision-making all the way down to consumers in the states.

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*Sponsored by the NARUC Executive Committee*

*Approved by the NARUC Board of Directors July 18, 2018.*