



NARUC

National Association of Regulatory Utility Commissioners

November 12, 2025

The Honorable Chris Wright
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: NARUC Comments on the Department of Energy's (DOE)
Speed to Power Initiative RFI

Dear Secretary Wright:

Thank you for the opportunity for the National Association of Regulatory Utility Commissioners (NARUC) to provide the following comments in response to the Speed to Power Initiative Request for Information (RFI).

NARUC is a bipartisan nonprofit organization founded in 1889. Its members include the government agencies in the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands charged with regulating the activities of energy, telecommunications, and water utilities. NARUC is recognized by Congress in several statutes and consistently by the Courts, as well as a host of federal agencies, as the proper entity to represent the collective interests of state utility commissions.

On September 18, 2025, to kickstart the Speed to Power Initiative, DOE issued an RFI focused on large-scale grid infrastructure projects, both transmission and generation, that can accelerate the United States speed to power. This includes input on near-term investment opportunities, project readiness, load growth expectations, and infrastructure constraints that DOE can address. The DOE has requested stakeholder input on how to best utilize its funding programs and authorities to rapidly expand energy generation and transmission grid capacity. NARUC's comments are directed at DOE's funding programs as it relates to technical assistance.

DOE has a history of supporting state utility commissions with technical assistance across a wide range of topics. NARUC members have been able to advance the nation's technology deployment more quickly and efficiently thanks to support provided by DOE program offices and DOE-funded National Labs. This technical assistance has included webinars, grants, workshops, trainings, and resources outlining best practices across a wide range of topics consistent with the many

opportunities to expand technology and innovation deployment among the states. This assistance has also provided direct support to states in applying modeling, analysis, and decision-making frameworks to their unique situations. A few recent valuable examples include:

- The Resources and Assistance for State Energy Offices and Regulators Program which provides Public Utility Commissions (PUCs) and State Energy Offices with high-impact technical assistance and resources at three different levels of depth and duration which are currently titled: Help Desk, Expert Match, and Deep Dive. Recent areas of technical assistance have included load forecasting for data centers, transmission advancement, integrated grid planning, grid modernization, and generator interconnection process improvements. Dozens of state PUCs have benefitted greatly from this assistance, accelerating their understanding and ability to wisely respond to stakeholder requests and state PUC obligations with data-informed modeling and analysis that would not otherwise be accessible.
- DOE support has enabled numerous National Labs to offer state utility commissions and consumer advocates access to virtual and in-person trainings on bulk power systems, transmission expansion, integrated distribution planning, electricity modeling, and other topics. These courses introduce non-technical attendees to key technical concepts and their practical applications in a highly dynamic electric system. DOE and Lab subject matter experts offer insights on topics identified and prioritized jointly by DOE and the regulatory community, which is highly valued by NARUC's state members. Hundreds of members attend and watch the training videos each year, expanding their understanding of complex technical topics and how they are relevant to utility oversight.
- The Energy Innovators Fellowship Program has supported recent graduates and early-career energy professionals to work with critical energy organizations, such as state PUCs, to modernize the power system, improve energy infrastructure for transportation and industry, and make the U.S. power system more reliable, affordable, and secure. The program has provided staff support to chronically under-resourced PUCs, allowing them to monitor and extract impactful research and best practices from DOE program offices and National Labs to their states in ways that are difficult to prioritize for overworked staff. Dozens of states have benefitted tremendously from this on-the-ground support that allows the host commissions to more quickly understand and move forward on key issues that include technology adoption and barriers slowing speed to power.

As DOE determines priority areas for what technology deployment investments will accelerate speed to power, NARUC advises that state PUCs will be extremely important partners given their oversight role as economic regulators of investor-owned utilities. Continuing to provide technical assistance, best practices, and support to such decisionmakers will enable DOE to achieve its goals most efficiently. Related, please continue to consider NARUC a key partner in your speed to power efforts.

If you have any questions about these comments, please contact us or Kim Duffley at 202.898.1350 or kduffley@naruc.org.

Thank you in advance for your consideration.

Sincerely,



Hon. Tricia Pridemore
President, NARUC
Commissioner
Georgia Public Service Commission



Tony Clark
Executive Director
National Association of Regulatory
Utility Commissioners