



National Association of State Energy Officials

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Tina Francone
Director, Grid Deployment Office
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Subject: National Association of State Energy Officials (NASEO) Response to the U.S. Department of Energy's Speed to Power Request for Information

Institution: National Association of State Energy Officials (NASEO)
Contact: David Terry, President, NASEO
Address: 1812 North Moore Street, Suite 1810, Arlington, Virginia 22209
Phone: (703) 299-8800
Email: dterry@naseo.org
Institution Focus: State Energy Policy

Dear Director Francone,

The National Association of State Energy Officials (NASEO), representing the 56 governor-designated State and Territory Energy Directors and their offices, appreciates the opportunity to respond to the U.S. Department of Energy's (DOE) Speed to Power Request for Information. We strongly support DOE's focus on identifying actionable approaches to accelerate the deployment of reliable and affordable electricity generation and grid optimization technologies needed to serve rapidly expanding industrial, commercial, and digital infrastructure demand.

State Energy Offices work daily to ensure residents and businesses have access to reliable, affordable, and increasingly clean electricity. Through partnerships with private-sector energy providers, utilities, and innovators, State Energy Offices play a central role in strengthening national grid security, enhancing economic competitiveness, and supporting technological innovation. Their role – distinct from regulators – is to provide governors and legislatures with timely policy analysis, market-informed strategies, and public-private collaboration frameworks that can rapidly reduce barriers to power project development. State Energy Offices also implement state policies, programs, and projects in cooperation with the private sector.

NASEO initiatives such as the Advanced Nuclear First Mover Initiative and the Geothermal Power Accelerator demonstrate how states are advancing governor-driven goals to bring new generation online, diversify supply portfolios, and support private-sector innovation. Likewise, NASEO's Electricity Committee has convened extensive discussions with states, utilities, hyperscale data center representatives, and technology providers to identify practical near-, medium-, and long-term measures to address escalating power demand, rising costs, and siting and

1812 North Moore Street
Suite 1810
Arlington, Virginia 22209
Telephone: 703.299.8800
www.naseo.org

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permitting challenges. The feedback and insights from these engagements directly inform the recommendations below.

NASEO’s General Observations on State Challenges (Section IV and Section V)

States across all regions are facing an unprecedented convergence of electricity system challenges, including:

1. Rapid, location-specific load growth – Industrial and digital infrastructure projects increasingly require multi-gigawatt service within accelerated development timelines.
2. Transmission congestion and interconnection delays – Backlogs in transmission and distribution interconnection queues impede both load additions and generation development.
3. Affordability pressures – Rising electricity costs for consumers and businesses – driven by distribution updates, congestion, peak demand, and infrastructure needs due to both replacement of aging infrastructure and the need for new infrastructure – are a top priority for state policymakers.
4. Workforce and permitting constraints – Staffing and skills shortages, complex permitting requirements, and multi-jurisdictional reviews slow project timelines and increase costs.
5. Data and coordination gaps – Suboptimal alignment among state economic development activities, utility planning, and RTO/ISO processes impedes load forecasting and generation/transmission planning.

These challenges require federal-state collaboration that is flexible, fast-moving, and aligned with state decision-making roles. NASEO and the State Energy Offices are committed to holistic approaches in addressing the nation’s complicated power and energy needs. The *Speed to Power Initiative* will be far more effective if it is implemented through state-federal-private partnerships that include all considerations and all types of generation as well as demand response, virtual power plants, behind-the-meter generation (e.g., load modifiers) and energy efficiency. An “all of the above” technology approach in the *Speed to Power Initiative* supports energy flexibility and enhances resilience by recognizing that with increasing demand, the nation will need a wide variety of resources in the near and medium term.

NASEO’s Recommendations for DOE Actions (Section III)

To support the accelerated deployment of generation and mega-storage projects across the states, NASEO and the State Energy Offices recommend the following for DOE’s consideration:

- **Establish Regional State – Federal Tiger Teams (Near-Term Actions)**

DOE should support six regional State–Federal Tiger Teams to accelerate coordinated action on a regional basis to address the following:

- Permitting and siting;
- Data-sharing and modeling;
- Alignment of the electricity and natural gas systems to increase reliability;
- Interconnection queue reform that builds on and complements recent reforms from FERC Order No. 2023;
- Transmission planning and congestion relief;
- Demand flexibility for large new loads; and
- Prioritization of high-demand growth zones.

Leadership from State Energy Offices – supported by governors – is essential to shorten timelines and align state, federal, and private-sector objectives. For example, NASEO and the National Association of Regulatory Utility Commissioners’ longstanding

partnerships with DOE can be leveraged to design and convene these teams. This approach also helps ensure that the *Speed to Power Initiative* is actionable at the state level and can address near-term power generation and grid optimization bottle necks and opportunities.

In addition, investor- and consumer-owned utilities should be included in the Tiger Teams where beneficial, and this could be facilitated through State Energy Offices and NASEO to avoid regulatory *ex parte* constraints. These teams could also build on existing state-led partnerships such as NASEO's Grid Optimization Task Force, Advanced Nuclear First Mover Initiative, and Geothermal Power Accelerator.

These Tiger Teams would also strengthen state-RTO/ISO collaboration, help reduce interconnection delays, improve regional load forecasting, examine co-location opportunities in siting large loads and new generation projects, and support state engagement and information sharing prior to federal actions that would extend the operation of electric generation slated for closure.

- **Address Affordability and Energy Burden (Near- and Medium-Term Actions)**

Ensuring affordability for consumers and businesses alike is a key component to add generation resources for additional loads across the states and needs to be included in any framework supporting generation projects. This includes concerns of cross-subsidization across rate classes and issues of aligning current investments with future benefits as well as concerns about a locational mismatch of benefits and costs.

DOE should offer targeted technical assistance to states that commit to deploying near-term (e.g., 1-2 years) grid optimization actions to reduce costs, such as accelerated reconductoring projects, grid-enhancing technologies, energy storage additions, and automated load management policies. All of these are policy options that are distinct from regulatory actions and deployable near-term.

DOE should consider working with State Energy Offices to establish state-led load forecasting modeling that better reflects a more comprehensive approach to anticipated economic development actions, technology innovations, and energy policy changes directed by the governors and legislatures. State economic development policy decisions such as non-energy incentives for major manufacturing and data center development can result in welcome but unforeseen load additions. State modeling, analysis and load forecasting that better integrates these impacts are important medium- and long-term actions to address affordability and reliability.

- **Flexible Technical and Planning Assistance for States (Near-, Medium-, and Long-Term Actions)**

DOE should establish competitively awarded planning grants to enable State Energy Offices to develop state-specific *Speed to Power* strategies, including:

- State-level *Speed to Power* Roadmaps;
- Grid optimization strategies;
- Planning for demand flexibility for new loads; and
- Load colocation planning near existing infrastructure.

Data utilized in recent grid planning actions by DOE and State Energy Offices could accelerate implementation of state-level *Speed to Power* actions in the near term.

DOE should also expand National Laboratory and external-expert technical assistance for states to support grid modeling and optimization, load forecasting, and geospatial analysis and siting. Establishing a Load Forecasting Technical Expertise Center, for example, to support state and regional efforts would help harmonize data and improve planning accuracy and could catalyze state-led load power forecasting improvements. This action is critical to informing and accelerating grid modernization over the medium and longer term.

- **Coordinate Federal Funding and Financing Tools (Near-Term)**

DOE can enhance generation project delivery by coordinating its planned funding and investments – such as the Grid Resilience and Innovation Partnerships (GRIP) Program, Grid Resilience State and Tribal Formula Grants (40101(d)), the Transmission Facilitation Program (TFP), and the Energy Dominance Financing Office – under a unified and strategic, resource-neutral approach that can be both informed by and leveraged by states. States should also have flexibility to apply DOE funds toward transmission-enabling infrastructure, grid-enhancing technologies, and both energy supply and reliability measures.

DOE and states should also cooperatively explore state-federal-private financing demonstrations, such as paired loan funds or accelerated development zones for Speed to Power projects. This could be implemented rapidly by engaging interested State Energy Offices where governors are committed to developing substantial new generation and storage and optimization of existing electricity loads, and transmission, and distribution systems.

- **Streamline Permitting Through Joint Pilots (Near-Term)**

DOE should partner with states to launch joint state-federal permitting pilots that test parallel environmental and permitting reviews and reduce redundant administrative steps for all types of generation, while maintaining environmental and consumer protections. DOE could also support development and deployment of PermitAI tools and provide model guidance for environmental review, benefits-sharing agreements, and state-level permitting modernization.

Additionally, DOE should coordinate federal efforts to expand transmission through existing highway and federal rights-of-way, in partnership with relevant state and federal agencies.

- **Improve Data Access and Transparency (Near-Term)**

DOE should expand open-access data platforms for data on transmission capacity and congestion, interconnection queue status, and federal project permitting timelines. This information would support state-level planning, investor decision-making, and accelerated siting and project development.

- **Workforce Development and Supply Chain (Medium-Term)**

DOE should consider partnering with states to develop coordinated workforce development programs supporting:

- Grid construction and modernization;
- Advanced manufacturing (e.g., supply chain);

- Skilled workforce (linemen, electricians);
- New generation deployment; and
- STEM and technical training.

These programs should be private-sector, demand-driven, and aligned with projected multi-decade infrastructure needs. More available workforce funding could expand existing university-state workforce trainings and other similar programs, which often have multi-year waitlists, to quickly educate workers in highly needed areas.

Federal and state coordination and action are also critically important for the supply-chain for generation and other energy infrastructure such as batteries, transformers and turbines. States and DOE could partner on identifying the supply chain constraints and develop a joint national strategy for state and federal actions to alleviate these constraints. For example, DOE and states could explore creating frameworks to collectively and proactively purchase—ahead of specific projects—key transmission equipment that will be needed in the coming years, to ensure this equipment is available, given lengthy order lead times. Such a framework could also explore mechanisms to purchase this equipment in bulk to help reduce per unit costs for all involved.

NASEO appreciates DOE's launch of the *Speed to Power Initiative*. We strongly support a collaborative federal-state approach that is flexible, data-driven, and aligned with state energy and environmental policies, economic development, grid reliability, and other state priorities. We look forward to working closely with DOE to ensure that accelerating power deployment is achieved in a manner that strengthens affordability, reliability, security, and national competitiveness.

Best regards,



David Terry
President, NASEO