



BERKSHIRE ENVIRONMENTAL ACTION TEAM
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US Department of Energy National Transmission Needs Study Public Comment Guide for Commenting to DOE

Comment period deadline: September 7, 2026 at 5:00PM Eastern Time

How to File an eComment

Send a simple text email, or attach a PDF of your comments to NeedsStudy.Comments@hq.doe.gov.

Comment Deadline: September 7th, 2025 by 5:00 PM Eastern Time.

Access the draft study [here](#).

From the Notice of the Comment Period:

“The Needs Study identifies key national needs that can inform investments and planning decisions. DOE is inviting feedback on this draft report from local communities, Tribal Nations, states, and regional reliability entities, as well as the general public, by opening a public comment period and hosting in-person roundtables in the summer of 2026 across the country. DOE will review comments received and incorporate them into the final study as appropriate. Direct public feedback is critical to bridging the gap between DOE’s analytical research and the dynamic, localized energy demands currently shaping the nation’s grid.”

Overview:

What is the Department of Energy National Transmission Needs Study?

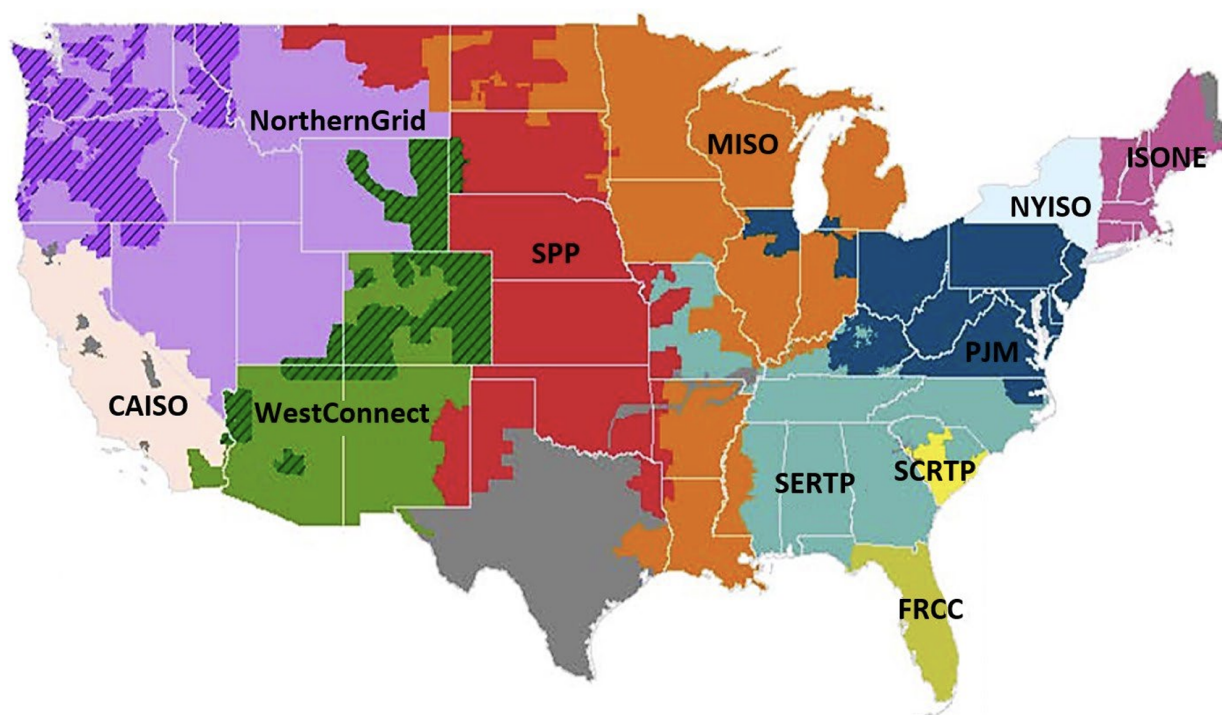
Every three years the federal Department of Energy (DOE) publishes the National Transmission Needs Study.

Primarily, this study is about identifying places where expansions and upgrades could reduce electric costs both financially and on the grid itself, and where potential projects may be planned. “Transmission congestion” is highlighted as a main issue with the U.S. electric grid. Transmission congestion occurs when the places that need energy the most have difficulty getting it, and the energy has to be rerouted through a less efficient path, which is costly to the customer. This can occur from the lines getting too hot, voltage limits, or limits on sending too much energy to one place to make sure the whole system is still stable.

The DOE proposes building new transmission corridors, which are long strips of land cleared to run high-voltage power lines, to solve grid pressure problems causing transmission congestion. These lines can have adverse environmental and economic impact on the communities that are sited for these projects, as it involves clear-cutting a wide stretch of land to erect the towers. This can cause environmental degradation in the form of habitat fragmentation and mass tree removal, as well as the economic impacts to agriculture, tourism, recreation, and views of the natural world.

Concerns to New England and Massachusetts, and the Berkshires

Generally, the study lays out potential pinch points for electricity demand and cost problems for customers, and explains that transmission line expansion can help alleviate these problems. In particular, the plan highlights regional collaboration. The U.S. energy grid is divided by grid management regions-, and these regions of energy infrastructure are called independent systems operators (ISOs) or Regional Transmission Organizations (RTOs).



Source: Federal Energy Regulatory Commission (2024).

Note: This image was formatted to improve legibility.

Figure III-2. FERC Order No. 1000 transmission planning regions.

MAP OF ISOs / RTOs shown in the [National Transmission Needs Study](#)

Collaboration between ISOs/RTOs can be beneficial as well as harmful. In certain cases, transmission expansion can lower costs for both regions receiving the transmission connection. However, each individual potential connection should be evaluated to determine if expansion is worth the harm or even necessary. In this new draft they specifically point out the connection between ISO New England and New York as a “high-congestion trouble spot,” implying that they are considering putting a transmission corridor across the Berkshires.



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1. Study shows that New England does not need expansion

The DOE study includes data that shows the price difference between the neighboring New England ISO and the New York ISO is vast, and that a connection between the two can alleviate grid and price stress. However, it is also repeatedly stated that New England has made several upgrades to their lines in the past few years through grid enhancement technologies, or GETs, which has significantly lessened the strain on the grid.

A study conducted by Potomac Economics (2024b) cited in the DOE study indicates that additional transmission investment in the New England region would not be economical in the near future (pp. 46-47). This study also finds that a reduction in peak energy (many customers using energy at once, for example in a heat wave or a cold snap) would reduce the costs of electricity enough that transmission expansion would be significantly reduced. A reduction in peak demand does not have to mean expanding transmission lines, and can be as simple as sealing air leaks in your home and investing in more efficient appliances. More information on peak reduction can be found at our website [here](#).

2. Expansion into New York does not indicate a significant benefit

Given the positive upturn in infrastructure for the New England region, it is to be assumed that New York needs the connection more than we do in New England. New York has a constant need for energy and resources to support NYC, while New England's infrastructure has been greatly improved. DOE states that cross-regional transmission expansion is how the grid and customers can gain the most value from transmission upgrades, as the diversity between regions leads to peak energy being used by different regions at different times. For example, a colder climate region connecting to a warmer region will not need to use the connection at the same time, as one region might get a heatwave and reach peak demand while the other might not. This argument falls flat in the case for the connection between New England and New York, as highlighted by DOE's study:

"The northeastern regions had the greatest overlap in peak net load hours, with NYISO (New York) sharing 72% of net peak hours with ISO-NE (New England) to the north and 74% of net peak hours with PJM East (Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and DC) to the south" (p.54).

With overlapping peak hours, this means cost reduction of the shared line will likely not be significant.

Why does this matter?

Every three years, DOE publishes a new National Transmission Needs Study. Within three years after publishing, areas of interest are identified as potential project sites, called National Interest Electric



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Transmission Corridors (NIETCs). The secretary of Energy determines these areas based on how beneficial a transmission expansion would be to an area. This can be identified through areas that already have transmission capacity restraints, or **areas where it is expected**. This wording is important to note with the rise of data centers being sited, especially for New England which has plenty of old industrial buildings that are eyed as potential data centers.

While the connection between New England and New York is speculative and very preliminary, voicing your concerns as a stakeholder can influence whether or not the area is designated as a NIETC.

In a previous NIETC proposal in October of 2024, DOE proposed clearing a corridor up to a mile wide along the Eversource power line corridor from Stephentown, New York to Northfield, Massachusetts. That proposal was put on hold after stakeholder comments, [including BEAT's](#), about environmental and economic impacts.

Several considerations are taken into account when determining an area as a NIETC. The Secretary of Energy was given the power to appoint these areas by the Infrastructure Investment and Jobs Act. Section 216 outlines the criteria considered to designate an area, and subsection G is of particular importance to New England residents as well as BEAT. This section calls the Secretary to consider if a proposed expansion plan maximizes existing rights-of-way, and minimizes impacts to sensitive environmental areas and cultural heritage sites. As stated in this study, if peak demand is reduced in New England, additional expansion is not economical, meaning efficiency and reduction can be explored, as well as upgrades to the existing lines.

Additionally, the ecotourism present in western Massachusetts is critical to the economy. Skiing, hiking, leaf-peeping and other economic drivers can be influenced by the presence of a massive clearing with tall towers. Significant disturbance to the natural beauty of the area can harm both the ecology as well as the financial stability of the region. Wetlands, agriculture, and continuous forestland could all be on the chopping block for clearcutting if this region is designated as a NIETC.

Key Points in Response to the National Transmission Needs Study

1. Wider comments on the study itself

- Saying the grid “needs more transmission” doesn’t have to mean clearing more land for huge power lines. In the report itself they say upgrading existing lines is a possible solution, so it’s worth trying to get the DOE to lean on upgrading existing corridors as a solution. This can be accomplished through GETs, battery storage, EV storage, and energy reduction/efficiency campaigns. If new power lines are to be installed, DOE should look at existing corridors first.
- The report relies heavily on projections of how much electricity data centers will use, and those projections should be questioned/reviewed before the DOE uses them to justify permanent new



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corridors that can't be undone. Data center proposals may currently abound, but can just as quickly be cancelled or moved as market conditions and contracts change. Large buildouts to serve what could amount to a temporary market boom could result in unnecessary environmental damage and stranded assets.

- Data centers should be required to supply their own power - all renewable with storage - and not draw from the grid.
- Just because an area shows congestion on paper doesn't mean a corridor should get approved there.
 - DOE needs to exhaust all other reduction options before considering expansion. This can be through distributing battery storage, efficiency programs, and additional existing transmission upgrades (GETs, dynamic line ratings) before proposing a new line.
 - The DOE needs to state clearly that a finding in this report still has to go through an environmental review before anything gets proposed or built.
 - Environmental review should consider impacts to wetlands, endangered species and carbon emissions, both upstream and downstream.
 - The DOE needs to investigate the economic impacts on ecotourism and agriculture if new lines are proposed.
- Under no circumstances should we build more fossil fuel generation and infrastructure to support it. It is too late in the climate crisis to continue the status quo.
- The study says most of the congestion problems happen in only about 5% of hours, usually during cold snaps and peak demand. This means that smaller targeted fixes like BESS/battery storage could handle electricity demand instead of building large new lines.

2. Points about New England

- Residents in Massachusetts and much of New England have repeatedly shown concern over building data centers. Rejection of a new data center proposal in Holyoke and backlash surrounding the data center in Lowell and their resulting bans / moratoria¹ demonstrate that Massachusetts stakeholders do not want to prepare our infrastructure for additional data center projects. Public pressure has been such that Governor Maura Healey has recently rolled back financial incentive programs for data centers². If the expected surge in their buildout is a defining reason for expansion, the state and the DOE should consider political will of the people.

¹ Lowell recently enacted a [year-long moratorium on data center expansion](#) and Holyoke placed a [ban on data centers over 12 MW in size](#).

² "Governor Maura Healey today announced that her administration will pause accepting data center sales tax exemption applications until stronger protections are in place for Massachusetts residents, businesses and communities." [Press release from the Governor's office](#), June 25, 2025.



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- Maximizing upgrades to the existing grid infrastructure should be thoroughly explored before designating the New England ISO and New York ISO connection a National Interest Electric Transmission Corridor.
 - Designation needs to concretely prove that a connection would be a significant reduction in cost for both ISOs, not just New York
 - A study on the capacity of the existing transmission lines in New England should be undertaken without speculating about data centers. If energy reduction seems to be enough to balance the New England budget, then construction of new lines should be deemed unnecessary.

An informational webinar has been posted and is available for viewing now on the Office of Electricity's website at <https://www.energy.gov/oe/national-transmission-needs-study>.

The topics above are examples of issues commenters may wish to address. Focus on the issues that are most important to you.

Please do not copy and paste these points directly. Reword any information you choose to include and explain why the issue matters to you.

How to file a comment

Send a simple text email, or attach a PDF of your comments to NeedsStudy.Comments@hq.doe.gov.
Comment Deadline: September 7th, 2025 by 5:00 PM Eastern Time.