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October 15, 2018

Lawrence Mansueti
Office of Electricity
U.S. Department of Energy
Forrestal Building, Room 8G-017
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Re: Public Comments For The October 17-18 Electricity Advisory Committee Open Meeting

Dear Mr. Mansueti, and Members of the Electricity Advisory Committee,

I write with one concern regarding the composition of the Electricity Advisory Committee, and a comment on the Committee's agenda to discuss *Perspectives on Grid Resilience*.

It is a problem that the Electricity Advisory Committee lacks household consumer advocate representation. Household consumers represent the single-largest class of electricity users in the U.S. (with over 36% of all electricity sales)¹, and feature a number of unique challenges—particularly for vulnerable populations, such as low-income families and the elderly—that require a voice on the Committee. While I am grateful that the Committee has solicited the viewpoint of a state government consumer advocate as a guest panelist for its *Perspectives on Grid Resilience* discussion, the Committee cannot be considered to be representative of all stakeholders as long as the largest single class of consumers lacks a formal voice on the Committee. The Committee should take immediate steps to appoint at least one household consumer advocate on the Committee.

Second, the Committee cannot have a meaningful discussion of Grid Resilience when the bulk of the U.S. Department of Energy's work on this subject continues to be conducted in secret, and relevant reports commissioned by DOE remain non-public. Since 2017, the U.S. Department of Energy has embarked upon an interventionist crusade to fundamentally transform U.S. power markets in pursuit of "grid resilience"—with most of the agency's work occurring behind closed doors.

Earlier this year, Public Citizen requested that the Department of Energy treat its grid resilience work as it would a public docket, providing a comprehensive public record of submissions to DOE regarding grid resilience activity (including requests by individual companies for action under 202(c) of the Federal Power Act), to include all communications, records and other material reflecting DOE's information gathering with outside parties and other Federal agencies.² We never received a response to our request.

¹ www.eia.gov/electricity/annual/html/epa_02_02.html

² www.citizen.org/sites/default/files/public-citizen-202c-letter-perry-may-2018.pdf

Furthermore, the Committee cannot adequately discuss grid resilience as long as the grid resilience study commissioned by the DOE's Idaho National Laboratory remains non-public.³ This grid resilience report—paid for by taxpayers—should be released to the public and to the Electricity Advisory Committee.

It is important to remember that the U.S. Department of Energy began its quest to upend U.S. power markets in pursuit of “grid resilience” at the direct behest of Bob Murray, the Chairman, President & Chief Executive Officer of Murray Energy Corporation.

Documents obtained under the Freedom of Information Act reveal that Andrew R. Wheeler, then a lobbyist (and now the Administrator of the U.S. Environmental Protection Agency), arranged a meeting of his client, Bob Murray, and Secretary of Energy Rick Perry for March 29, 2017. At this meeting, Mr. Murray handed Secretary Perry “an Action Plan for achieving reliable and low cost electricity in America and to assist in the survival of our Country's coal industry.”⁴

The second “Action Plan” item demanded by Mr. Murray on March 29 reads: “The Department of Energy must issue an emergency directive to have an immediate study done of the security and resiliency of our electric power grids.” Sixteen days after Mr. Murray demanded it, Rick Perry directed his chief of staff in an April 14 Memorandum “to initiate a study to explore critical issues central to protecting the long-term reliability of the electric grid . . . that will explore . . . whether wholesale energy and capacity markets are adequately compensating attributes such as on-site fuel supply and other factors that strengthen grid resilience.”⁵ The Electricity Advisory Committees needs a complete accounting of the outside interests that have influenced the Department of Energy’s “grid resilience” advocacy.

Respectfully submitted,

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³ Ari Natter and Jennifer A. Dlouhy, "Study That Failed to Back Trump's Coal Rescue Plan Is Kept Under Wraps," Bloomberg, October 12, 2018, www.bloomberg.com/news/articles/2018-10-12/study-that-fails-to-back-trump-coal-rescue-plan-kept-under-wraps

⁴ www.eenews.net/assets/2018/06/07/document_gw_01.pdf

⁵ www.crowell.com/files/20170414-Memorandum-Study-Examining-Electricity-Markets-and-Reliability.pdf