## Coordinated Interagency Transmission Authorization and Permits Webinar Transcript

WHITNEY BELL: Hello. And welcome to the Coordinated Interagency Transmission Authorization Permits, also known as CITAP, webinar. I'm Whitney Bell, with ICF. And I will be your host today. First, a few housekeeping items for today's webinar. This Webex meeting is being recorded and may be used by the US Department of Energy. If you do not wish to have your voice recorded, please do not speak during the call. If you do not wish to have your image recorded, please turn off your camera, or participate by phone. If you speak during the call or use a video connection, you are presumed consent to recording and use of your voice or image.

All participants are in listen-only mode. So if you need to view the live captioning, please refer to the link that will appear in the chat now. We will have time for Q&A after today's presentations. You may submit questions at any time using the chat function.

Additionally, if you have any technical issues or questions, you may type them in the chat box, and select Send to Host. Also, a popular question we get throughout the day, so pay close attention. A copy of today's presentation will be posted on the May 15 Coordinated Interagency Transmission Authorization and Permits final rule webinar web page by Monday. And the recording of today's webinar will be available on that same page in about two weeks.

During today's webinar, we'll hear an overview of the Grid Deployment Office and details of the CITAP program, what it is, why we need it, key aspects, and benefits of DOE's approach, which we'll learn more about today. All right. With all of those announcements out of the way, let's go ahead and get started. First, we'll hear from Maria Robinson, the Director of the Grid Deployment Office, for her opening remarks. Maria, I'll turn this over to you.

MARIA ROBINSON: Thank you, Whitney. Welcome, everyone. Good afternoon or good morning, depending on where you are. My name is Maria Robinson. And I have the distinct pleasure of leading the Grid Deployment Office here at the United States Department of Energy.

The Grid Deployment Office, or GDO, oversees more than \$22 billion from the Bipartisan Infrastructure Law and Inflation Reduction Act. And we focus on addressing these three critical priorities. One is ensuring resource adequacy by supporting critical generation sources and expanding and enhancing electricity markets. Two, we're catalyzing the development of new and upgraded high-capacity electric transmission lines and an improved distribution system nationwide. And three, focusing on preventing outages and enhancing the resilience of the electric grid.

Put another way, GDO's key mission is to improve and expand electric transmission and distribution infrastructure across the United States to ensure consumers across the country have access to reliable, affordable power when and where they need it, and to enable the integration of clean energy into the grid. Implicit in this mission is the recognition that if we cannot permit new transmission infrastructure in a timely manner, we may not reach our grid reliability and clean energy goals. And as such, the Grid Deployment Office is utilizing every federal tool at our disposal to make federal permitting more effective and efficient.

Right now, building new electric transmission projects can take more than a decade, in part because projects must navigate complex review processes across several different federal agencies. Without a clear mechanism for agencies to talk with each other, work with each other, these processes can result in duplicative work that adds unnecessary time to the review and authorization timeline.

In order to address these challenges, GDO has developed the Coordinated Interagency Transmission Authorization and Permits program, or CITAP. So CITAP will make the federal permitting process for transmission infrastructure more efficient and effective by establishing the Department of Energy and, by extension, the Grid Deployment Office as the lead agency responsible for setting deadlines for authorizations and permits, coordinating federal agencies and other partners to meet those deadlines, and requiring developers to prepare a public participation plan ahead of the permitting process. Ultimately, by enabling the United States to build new electric transmission infrastructure at a faster rate, CITAP will help increase access to a diverse array of energy sources, reduce transmission congestion and energy prices, and deliver reliable, affordable power to consumers when and where they need it. Publication of this CITAP final rule is the culmination of months of interagency coordination, public comment, stakeholder engagement. And it outlines when and how the Department of Energy will execute its authority in coordination, of course, with our great agency partners.

So we look forward to building on the strong foundation of interagency coordination that we've already begun to listening to and learning from each other and to making the CITAP program the very best that it can be. So with that, I'll turn the mic over to my colleague, Sam Walsh, our General Counsel here at the Department of Energy, to provide some more detail on the program and how we've engaged with our agency friends. Sam.

SAM WALSH: Thank you, Maria, for that introduction. And good afternoon, everyone. My name is Sam Walsh. I'm the General Counsel at DOE. And as Maria explained, the creation of the CITAP program is a really important milestone. It represents a new way of doing business for the federal government with respect to transmission permitting.

And there is a critical need to expand transmission capacity in the United States, as probably most of you attending this webinar understand. We need transmission to meet load growth. We need it to enhance the reliability and resilience of the grid. We need it to lower energy costs for families and businesses and to connect more clean energy resources to our grid.

CITAP is intended to accelerate and streamline the federal permitting process for qualifying transmission projects, because in the past, far too many transmission projects have been bogged down in the permitting process. The consequences of those delays could be that projects needed to alleviate congestion and constraints are built far too slowly. Some projects are never proposed or never built at all. Through the CITAP program, we will implement the authority granted to us by Congress in the Energy Policy Act of 2005, which is codified at section 216(h) of the Federal Power Act. Under this authority, DOE acts as the lead agency in coordinating and accelerating federal environmental reviews and approvals for qualifying transmission projects. DOE will set binding schedules, facilitate open communication with our interagency partners, and ensure that each applicant's critical preapplication work gets done efficiently and in a manner that serves the needs of all agencies.

By facilitating early and frequent communication across federal agencies, the CITAP program will expedite transmission permitting timelines, saving everyone time and money without sacrificing the quality of any environmental reviews. While the CITAP final rule was an enormous undertaking and

should be a cause for celebration, our work is really only just beginning as we turn toward implementing the program.

And most importantly, we cannot implement the CITAP program alone. Getting to where we are now required robust interagency collaboration, as was shown by our eight federal partners who signed the MOU in May 2023, kicking this all off. But this is only the beginning. We're going to be leaning increasingly on the insight and expertise of our trusted federal partners once we start receiving applications for prospective transmission projects.

And in keeping with that spirit of interagency collaboration, I'm excited to welcome my colleague from the Department of Interior, Associate Deputy Secretary Sarah Greenberger, to speak to the CITAP program and our ongoing partnership. Welcome, Sarah.

SARAH GREENBERGER: Good afternoon, everyone. Hello to Maria and Sam and all of our partners on today's call. And thank you, Sam, for introducing me.

I'm Sarah Greenberger. As Sam said, I'm the Associate Deputy Secretary at the US Department of the Interior. And I work daily with the bureaus and offices at Interior that are a major part of these transmission permitting efforts, including the Bureau of Land Management, the Bureau of Indian Affairs, the US Fish and Wildlife Service, and the National Park Service.

As a signatory to the May 2023 memorandum of understanding, Interior has been engaged over a year to anticipate and build the crossorganizational connective tissue that's going to be necessary to meet the really important purpose, as well as the deadlines that are set forth in the CITAP final rule. The CITAP final rule establishes a two-year binding schedule for the federal agencies to issue authorizations and permits for qualified transmission facilities.

The timelines in DOE's final rule are as ambitious as these projects are challenging, permitting major infrastructure that crosses multiple jurisdictions across many states and multiple landowners. It's tough work. And there are many voices, raising different equities and concerns, that must be considered throughout the public process.

Federal agencies, we know, must continue being adaptable and flexible and how we work together, and in how we develop practical solution sets for the challenges associated with transmission. But we do big things in our agencies. We do them together. We do them well. And we bring that record to the task of permitting transmission that will transport clean electrons from the places where they are generated to the businesses and homes across the country that need them.

We look forward to continuing strong multidepartment collaboration that it takes to permit transmission through the CITAP program. And DOE plays a central role in how the United States stewards its public lands. We have a wealth of knowledge and decades of experience in environmental review and analysis. And we are eager to share this expertise with DOE, our federal partners, transition project proponents, and the communities that we know care so much about nearby infrastructure proposals.

We look forward to working closely with our federal partners, who have their own expertise to bring to the table and are likewise responsible for performing the thorough due diligence for the permitting of proposed transmission projects. Ultimately, we do have a shared mission and responsibility to ensure that CITAP applicants are prepared to submit the necessary documentation to apply for federal authorizations and permits.

Achieving this mission will require information sharing and interagency collaboration that, as Maria and Sam touched on, has already been underway for some time. Interior looks forward to continuing to work

across our authorities, our roles and responsibilities to achieve our shared transmission goals. Thank you for inviting me to be here. And I'll turn this back to Whitney.

WHITNEY BELL: Thank you, Maria, Sam, and Sarah. Really, really appreciate it. Next, we'll hear from Jeff Dennis. He's the Deputy Director for Transmission at the Grid Deployment Office, for a more in-depth look at the CITAP program. Jeff, welcome.

JEFF DENNIS: Thank you. And good afternoon and good morning to everyone. Happy to continue the discussion and dive a little bit more into the CITAP program and what it intends to achieve.

So as Sam mentioned earlier, enabling the US to-- by enabling the US to expand transmission capacity at a faster rate, CITAP will help address critical national transmission needs. For example, we see significant need for transmission to increase grid resilience and reliability.

The department's 2023 National Transmission Needs Study performed by the Grid Deployment Office found that nearly all regions in the US would gain improved reliability and resilience from additional transmission investments. Ensuring that transmission is not only built where we need it but when we need it is a crucial element that CITAP helps address.

In addition, we need transmission to lower electricity costs for consumers. By accelerating the development of transmission infrastructure, the CITAP program plays an important role in helping ensure that customers can access a diversity of generation resources. The program also allows us to reduce costly transmission congestion, and deliver reliable, affordable power to American homes and businesses when and where they need it.

Building new interstate transmission lines has been widely identified by DOE and our National Transmission Needs Study and independent experts as essential to reducing consumer costs, by simply moving low-cost power from where it's available to where it is needed but can't be delivered due to transmission constraints.

Third, key sections of our transmission infrastructure were built decades ago and are in need of repair, replacement, or modernization. Some regions have particularly acute reliability and resilience needs that additional transmission deployment can address. Enabling transmission solutions to be permitted and deployed more quickly through the CITAP program enables swifter deployment of this critical infrastructure that communities rely on.

And finally, this program is critical to spurring economic growth. Energy underpins every industry and sector of our economy. Access to affordable, reliable electricity is essential for economic growth and well-being. And our country's robust transmission network is what ensures that energy gets from where it's produced to where it needs to go. As we see the advent of new industries increasing demand for electricity, it is imperative our transmission infrastructure is capable of expanding in parallel such that we can capitalize on these economic opportunities.

Next slide. So how will CITAP accomplish these goals when it comes to federal permitting? CITAP makes federal permitting for transmission infrastructure more efficient and effective by setting a two-year binding schedule for federal agencies to issue authorizations and permits and by leveraging DOE's coordination and environmental review resources to prepare environmental review documents needed to support such authorizations and permits.

By doing this, DOE will shorten the average length of time that transmission developers spend acquiring federal permits almost in half, down to two years from roughly four years. The timeline reduction from four

years to two years will be accomplished by DOE helping shepherd transmission projects through multiple parallel review processes with other federal agency partners on that binding schedule.

In this way, think of DOE as playing the role of convener, coordinator, or quarterback, if you will, between the project proponent and the relevant federal entities. Project proponents will still ultimately set the cadence based on their responsiveness to DOE and agency partners' requests during this process, as laid out in the final review.

Developers retain responsibility for gathering information necessary to meet authorization requirements. And DOE will provide guidance to developers to ensure that project permitting and authorization materials meet federal standards, helping developers navigate multiple federal authorizations at once, rather than developers applying for authorizations from federal agencies in a piecemeal fashion.

I want to emphasize that the quality of environmental reviews is not sacrificed through this more efficient timeline that CITAP introduces. Importantly, the CITAP program does not change any federal decision-making authority or NEPA regulations. DOE will lead NEPA in accordance with its NEPA regulations, coordinate authorization and permit schedules, and lead preparation of a single environmental review document to support decision-making. But that decision-making authority remains with the agency responsible for the permit or authorization. Next slide.

So while CITAP ends with a single environmental review document that can support the decision-making of all the involved relevant federal agencies. It begins with a preapplication process called the Integrated Interagency Preapplication process, or the IIP for short.

The IIP, which is thoroughly and carefully defined in the rule, enables federal agencies led by DOE to prepare applicants, coordinate among federal entities and state and local permitting agencies, and ensure early engagement with affected communities. One big benefit of this program is that DOE adds more resources to the process, including subject-matter experts, to supplement existing staff from other agencies.

Through this program, DOE acts as the single point of federal entry for the most complicated transmission projects that require multiple federal environmental reviews and authorizations. The coordinating functions of the CITAP program will take place via an online portal, which will engage participating agencies and allow agencies to view and provide input during the IIP process and during the two-year process of conducting federal environmental reviews.

The CITAP portal is an online interface that transmission developers will use to submit their application materials for CITAP and through which and federal agencies will review those materials. Applicants upload initial and revised materials through that portal. DOE reviews and shares with the federal agencies for input and iteration.

Early, frequent, and open communication between DOE, federal and state agencies, and the project proponent will be critical to ensuring this process flows smoothly and that it leads to developing the information that's needed to conduct an efficient NEPA review process. CITAP app culminates in a DOE-led process to coordinate NEPA review and publish a single Environmental Impact Statement, or EIS, that incorporates and serves as a foundation for decision-making by the relevant federal agencies. Next slide.

CITAP provides several other benefits that can help bring speed and efficiency to permitting for large and complex transmission projects. For example, through the CITAP program, DOE will also coordinate with

nonfederal agencies that have a stake in interstate transmission projects, such as responsibility for permitting under their own laws.

State and local agencies can voluntarily opt to participate in CITAP, use DOE's single Environmental Impact Statement, described earlier, as the basis for their own decisions with respect to those projects. This can help further improve transmission authorizations and permitting processes over the status quo we see today.

We also want to note that for the first time, DOE is requiring transmission developers to develop a public participation plan before they apply for federal authorizations and permits, which will help ensure that communities and key stakeholders are identified and accounted for at the onset of the permitting process. This is a new and novel approach to transmission infrastructure development, reflects best practices—I'm sorry— and reflects best practices in engaging communities early and often to ensure success.

Finally, federal review and decision-making in the preapplication phase is time limited. But total time to completion depends on the project proponent's preparedness and responsiveness. During the two-year EIS and permitting timeline, the agencies agree to establish a project-specific schedule that will establish milestones for permitting and authorization decisions at the relevant federal agencies. And with that, I will turn it over to my colleague Marina, who will discuss more.

MARINA FENNEL: Hello, everyone. I'm Marina Fennell. I'm a Senior Technical Advisor for the Federal Permitting team here in the Grid Deployment Office.

Here, we have an overview of the mechanics of the preapplication process, or as we call it now, the IIP process, at a high level. As a reminder, the initial submission, refinement, and review of all these materials take place in the CITAP portal. The IIP process starts when transmission developers submit an initial application to the CITAP portal, which will include a summary of the project and the public participation plan.

The summary will describe the proposed project's impacts on land, water, plant and animal life resources, and identify which federal authorizations or permits may be necessary. DOE will also disseminate these materials to other relevant federal and nonfederal entities and decide within 20 days whether the project meets the requirements to be admitted to the CITAP program.

If admitted to the CITAP program, applicants will proceed with the IIP process, which follows an important three-meeting structure-- the initiation meeting, a review meeting, and a close-out meeting. Let me share with you how each step will be conducted. The initiation meeting-- between the initiation meeting and the review meeting, DOE will work with the applicant to ensure the required information for federal authorizations and permits is assembled.

Applicants will also use this time to schedule meetings with federal and nonfederal entities to identify potential siting constraints and address any challenges that may arise when officially applying for a permit or an authorization. Further, applicants will have time to update their public participation plan between the initiation and the review meetings.

Next is the review meeting. Between the review meeting and the close-out meeting, the applicant will be responsible for updating DOE on any public engagement and siting activities that took place between the review and the close-out meeting. DOE will then begin to draft a project-specific schedule for environmental reviews, using the standard template schedule and the information shared thus far in the IIP process.

And the last one is the close-out meeting. At the close-out meeting, DOE will present the final project-specific schedule. After the IIP process has concluded, within 90 days, DOE will issue a notice of intent and formally begin the environmental review process. Issuance of the NOI begins the two-year clock for the development of a single Environmental Review Document.

As a reminder, developers will be responsible for gathering the necessary information that DOE requests and for continuing the preapplication process in response to DOE and relevant federal agencies reviews. DOE defines its responsibilities and response times to each of these major developer actions. But the total amount of time a developer spends in the IIP process is largely dependent on the developers' responsiveness to DOE and federal agency requests. Next slide please.

Here, we have an example of the standard EIS schedule. DOE has developed a standard schedule template that outlines how federal environmental reviews and authorizations for transmission project coordinated by DOE will proceed to completion within a two-year timeline. Here is also an overview of the mechanics of the standard schedule, in which you could see the IIP process that we just discussed on the left of the notice of intent and then the two-year timeline for preparing an environmental review document to the right of the NOI.

As stated earlier, after the preapplication process or the IIP process closes out, the timeline begins with the publication of a notice of intent to prepare an environmental impact statement and concludes in a record of decision for that EIS. All agencies will be responsible for any respective decision documents needed as a result of the EIS.

It is important to note that where is the standard schedule is a template, each project will ultimately have its own project-specific schedule depending on the project scope and location. During the preapplication process, DOE will work with applicants and with federal agencies to develop a project-specific schedule that incorporates robust analysis of project impacts and early and meaningful consultation with potential affected communities, tribal nations, or other stakeholders.

Last point on this slide, as a step forward to our commitment to address federal permitting constraints, DOE also established a new CITAP interagency working group to facilitate federal interagency partnership and collaboration and to foster cooperative staff relationships among the participating agencies, where we now share lessons learned and best practices that can be applied to the CITAP program.

This partnership is tailored to bring federal subject-matter experts to the round table and assist GDO in developing permitting evaluation materials as well as educational outreach and user information for the CITAP portal to improve the quality and consistency of requisite data analysis. Through this partnership and engagement, we leverage on permitting experience to implement coordinated strategies and efficient preapplication processes and apply best practices to reinforce individual agency policies. Next slide please.

Transmission developers can now apply to the CITAP program as early as 30 days after publication in the federal register. The final rule was published on May 1, which means the CITAP portal will open as early as May 31. And DOE can begin accepting applications. Do note that the CITAP portal is a new DOE platform designed specifically for transmission developers to submit their requests and participate in the CITAP program.

The portal will outline the step-by-step process for transmission developers to apply to the CITAP. The portal will allow users to track their applications and provide comments in real time. Once the initial IIP

determination is completed, DOE will notify potentially involved federal and nonfederal agencies to access the portal and begin to review project application and pertinent resource reports.

By doing so, DOE will be able to streamline the application determination process and enhance cooperating efforts and ultimately to deliver a timely completion of a federal permitting review and the development of a single environmental review document. The goal of the portal is to provide timely review by facilitating early coordination and information sharing for permitting and environmental reviews and compliance.

Therefore, after May 31, please check out citap.gov, and submit your application. Thank you for your time.

WHITNEY BELL: Thank you so much. We really appreciate the further details in the CITAP program and the permitting process. So we now have time for Q&A. Please continue inputting your questions into the chat. I did want to let you know that if any questions are very similar, we may combine them to avoid responding to duplicate questions. And we will do our best to address the relevant points in all of our responses.

Any questions that are not answered during today's Q&A session may be used to inform the FAQ. So along with Jeff Dennis, we have Steve Blazek, NEPA Compliance Officer with the Department of Energy, joining us for our Q&A. So as they are brought up here on stage, and if you want to turn on-- oh, great, you're there. So let's go ahead and get started with our first question.

This one is for you, Steve. How will DOE ensure the quality of environmental reviews is maintained within a shorter time frame?

STEVE BLAZEK: Great question, Whitney. Thank you. Probably important to start the response with clarifying, as was presented in the presentation here, that the CITAP program itself doesn't fundamentally alter any existing environmental regulations, authorizations, or responsibilities for any other federal agencies that we're going to be coordinating with through the process. DOE's role in this is to function as that entity that is doing the coordination.

And I think a valiant-- and I think it's going to be a successful effort to address what's well-recognized as the single biggest delay in the permitting and authorization approval process and the timelines is that the challenge has inherently been on the developers to have to coordinate between the various agencies and their various regulations that they have to follow. DOE's role in this is to manage that timeline and all the information that comes in that-- that comes through the process on that timeline. And we're going to establish the schedule and hold to that timeline.

I think the key word in the question is quality. How can we do this coordination effort on that tighter timeline and make sure that the defensibility and the quality of the information in the process is defensible, all the way across the board. And I think the answer is it's embedded in the program itself. We're going to collect information from the developers prior to starting the environmental review clock on the NEPA side, through the 13 resource reports.

And in our coordination role, we are going to go through that information. We're going to work with the developers and then communicate that information back to the other participating agencies so that we all have the same informed, meaningful start, and having an understanding of all of the authorities that are at the table with a quality first -round of information to work with is the key to ensuring that we have quality built into the process.

WHITNEY BELL: Great, thank you. I appreciate that robust answer. Another question for you. Will the public have access to the portal?

STEVE BLAZEK: That's a yes and no kind of a question. So the portal is built to exchange detailed project information from the developers back to the Department of Energy. And then we'll take the role of, as we just discussed, working with the other federal and other partners involved in the process. The public can access the citap.gov Home page. And they can request docket information.

DOE will create a single administrative docket for each project that will consolidate all the information assembled and utilized by the federal partners, those folks involved in the process, as that basis for conducting the reviews. DOE and any co-lead agency that's involved in the process will maintain that docket, which again will be available upon request, of course, with the understanding that confidential or other protected information would not be available to the public.

WHITNEY BELL: Thank you.

STEVE BLAZEK: Sure.

WHITNEY BELL: Thanks for clarifying. Jeff, what projects does this apply to?

JEFF DENNIS: Thanks, Whitney. Sure, I can provide an overview. The regulations define a qualifying project as a high-voltage electric transmission line that is rated at 230 kilovolts or above or an otherwise regionally or nationally significant electric transmission line and its attendant facilities that is used in interstate or international commerce and is expected to require an environmental impact statement. So this really gets at trying to identify the most significant and most complex projects that will benefit from CITAP coordination. In addition to that basic definition, the director of the Grid Deployment Office is authorized under the regulations to approve a project for inclusion in the CITAP program if it does not meet this definition.

In the final rule, we've also added some factors that will guide our determination of whether a project that does not meet that basic voltage definition of 230 kV or above is otherwise regionally or nationally significant. And the relevant factors that we'll consider include how the project would reduce congestion costs for generating and delivering energy, how it would serve a function in mitigating weather disruptions, variable generation uncertainty, or enhanced diversity of supply.

In addition, the regulations speak to how the director may include other projects at her discretion. And in making that determination, she may consider whether the proposed facility would benefit from CITAP coordination, whether the proposed facility would result in reduced congestion costs, whether the proposed facility would result in mitigation of weather and variable generation uncertainty, whether the proposed facility would result in an enhanced diversity of supply, or any other relevant factors that the director considers.

WHITNEY BELL: Thank you. Steve, how quickly can the preapplication process, IIP, go? STEVE BLAZEK: Good question. The timelines that we have built in for DOE for our required or established meetings and action points is 185 days. It doesn't mean that would take 185 days. It could be shorter if the project proponent is bringing the information to the table and is prepared to act quickly along with us.

The time in between those established milestones, the 185 days in the schedule, it's going to be-- how long that takes is really going to be based on the project proponent, the information that comes in, and really, the readiness of the project itself to be able to go forward. We're not looking to necessarily press

the IIP side of the schedule. The goal is to collect that meaningful, actionable information to take to our other federal partners and then establish the start date on the NEPA process.

WHITNEY BELL: And along those same lines, what materials must developers submit during the preapplication stage?

STEVE BLAZEK: Yeah. So what we're looking for through this program-- and Marina talked about this a bit-- is the 13 resource reports that they're going to bring to us through the portal as part of this preapplication process. Those 13 resource reports focus on the areas that we would expect DOE and our other federal partners to analyze as we went through the NEPA process. So those 13 resource reports consist of things like a detailed project description and then a lot of resource-specific baselining information-- again, the kinds of issues or resources that we're going to look at in detail through the NEPA process-- biology, cultural resources, those kinds of things.

What we're trying to do through this process is develop the information that we need through this IIP process to meaningfully and effectively work through the NEPA process once that clock starts, and circling back to the first question, Whitney, while ensuring that the quality of the analysis is supportable and defensible so that all federal partners can make their decisions and their requisite authorizing actions at the end of the process.

WHITNEY BELL: Thank you so much, Steve. And just a reminder, if you'd like to ask any additional questions, we're coming up on a couple of our last ones that we've had come in here. So feel free to put those in the chat. I'll ask those on your behalf. So, Jeff, this question's for you. How is CITAP different from NIETC and backstop siting?

JEFF DENNIS: Thanks, Whitney. So although the National Interest Electric Transmission Corridors program and the CITAP program are both founded in section 216 of the Federal Power Act, they are distinct. So the National Interest Electric Transmission Corridors program, or NIETC, as we call them, derives its authority from section 216(a) of the FPA. And NIETC really are DOE's effort to identify areas where transmission development is in the national interest.

Our recent guidance document states that NIETC corridors are geographic areas, not specific transmission projects. However, projects in NIETC may be eligible for coordination under either the CITAP program or by the Federal Energy Regulatory Commission, in some circumstances. And of course, the NIETC program leads to certain financial and permitting authorities as well, including DOE has the ability to financially support projects in NIETC. And the Federal Energy Regulatory Commission can grant permits for those projects in certain limited instances.

The CITAP program, by contrast, derives its authority from section 216(h) of the Federal Power Act. And under that section of the Federal Power Act, Congress designated DOE to serve in a coordination capacity across the federal government and to set and maintain a schedule for federal environmental reviews and permits and authorizations for transmission projects within that two-year deadline that we talked about earlier.

So CITAP is a different part of section 216(h), focused on coordinating federal permits. There is an opportunity for states to participate, as I mentioned. But NIETC corridors are really focused on a different attention-focusing effort as well as a potential limited ability for FERC to provide some backstop siting in limited circumstances.

WHITNEY BELL: Thank you. Appreciate the explanation there. So final question I see in, so far, unless we another one pops in, is for you, Jeff. How did the final rule change from the NOPR?

JEFF DENNIS: Yeah, thanks. We did make some changes based on comments that we received on the NOPR. We received 50 unique comments on the proposed rule. 27 of them generally supported the CITAP program. And then we got a number of comments that really were thoughtful and helped us make what we think are some important changes to the final rule.

For example, DOE originally proposed 330 days for our reviews and responses during the IIP process. In the final rule, we were able to reduce that time to 185 days. And that was really done by DOE committing to quicker and more efficient reviews and turnarounds during the IIP process. So the developers can complete that IIP process even sooner, again, as Marina emphasized and as Steve emphasized as well, assuming that they are responsive to requests that go out. So DOE shortened its own time so that it can move faster, assuming that developers are responsive to it.

Second, I mentioned those proposed—those definitions of qualifying projects earlier. We modified our proposed definition to include that list of criteria that we may consider, whether a project is regionally or nationally significant, and also modified to include a similar list of criteria that the director may consider when she is evaluating whether projects that don't meet that core definition of qualifying projects should nonetheless participate in CITAP.

In addition, the single administrative docket proposed to be created at the end of the CITAP program, which consolidates all of a project's environmental reviews, can be requested by any member of the public. The final rule clarifies that. In addition, the final rule establishes DOE as the lead for reviews under the Endangered Species Act and National Historic Preservation Act, unless another designation agency is designated as lead for a project.

And further, the final rule also specifies the DOE may authorize a CITAP applicant to initiate consultation with tribal governments in compliance with the National Historic Preservation Act, section 106, during the IIP process, if the scope of the project is sufficiently developed. And finally, eight proposed definitions and various terminologies were modified and made more consistent in the final text.

WHITNEY BELL: Great. Thank you so much. I appreciate you explaining those little changes there. So that does wrap up today's webinar. I didn't see any other questions come in.

So to find out any more information about the CITAP program, please visit the program web page. You can find the link in the web page in the chat now. You can also send your questions to the email address on your screen and in your chat. And as a reminder, a copy of today's presentation will be posted on the May 15 CITAP final rule webinar web page by this coming Monday. And then the recording of today's webinar will be available on the same page in about two weeks. And we will email you when that is available so you will be able to go directly to it.

So, Maria, Sam, Sarah, Marina, Jeff, and Steve, thank you so much for joining us. And all of our attendees, thank you so much for participating today and for your thoughtful questions. Take care, everyone, and we will see you next time.