

From: Michael Stevens <michaelostevens@gmail.com>
Date: June 24, 2024 at 3:08:50 PM EDT
To: nietc@hq.doe.gov
Cc: Chris Colvin <ccolvin@me.com>
Subject: Public Comment on NIETC proposals

I write on behalf of Protect Catlett, a community level citizen group in Catlett Virginia established last year to ensure the right decisions are taken with respect to data center siting and new power line construction in Southern Fauquier County.

In the face of unprecedented data center driven energy growth in Northern Virginia, we understand the concern on the part of the Federal Department of Energy to designate National Interest Electric Transmission Corridors for the Mid Atlantic Region. In this way the DOE is seeking to provide a guiding framework for new and enhanced power transmission lines for the generation and delivery of energy to the Northern Virginia area which has become the focal point of this explosion of demand.

Unfortunately, as we see it, this response constitutes only a partial response to the crisis. If this supply side initiative is not accompanied by complementary efforts to better manage demand, it risks making an already untenable situation even worse, leading to grid breakdown.

Additional steps need to be taken by DOE, in our view, in the following areas, at a minimum.

1. Data centers are wasteful power hogs, and must be forced to significantly improve their power utilization efficiency, particularly in regard to the design and running of cooling systems. In contrast to other parts of the world (eg EU and SE Asia) facing similar DC driven energy consumption expansion, in the US the industry is given a regulatory pass on power use efficiency, for which proven technological solutions exist. DOE should lead in setting nationwide standards which states should adopt by law.
2. The way generation and powerline construction costs are shared between categories of consumers needs to change. The traditional method of apportioning the burden of costs equally between residential, commercial, industrial and now data center users was developed in an era when all categories were growing incrementally at moderate rates. Now the growth is hugely disproportionate, with the first two categories almost static and the DC category growing and projected to continue at explosive rates. If the costs of meeting this demand are shared proportionally among all users, this will result (as the NVA utility Dominion projects) in a doubling of domestic tariffs in real terms by 2030. The political and social implications of such an outcome are huge and DOE needs to work with utilities and their regulators to avert this by changing the way investment costs are apportioned.
3. At the same time, attention needs to be paid to the variation in tariff levels between different user categories, which results in residential consumers paying almost twice the unit price compared with data centers. This results in residential consumers subsidizing data center operators, in effect turbo charging demand. This in turn feeds back into power use efficiency. The more DCs enjoy