

February 17, 2026

The Honorable Laura V. Swett  
Chairman  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, DC 20426

The Honorable Judy W. Chang  
Commissioner  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, DC 20426

The Honorable David Rosner  
Commissioner  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, DC 20426

The Honorable David A. LaCerte  
Commissioner  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, DC 20426

The Honorable Lindsay S. See  
Commissioner  
Federal Energy Regulatory Commission  
888 First St., NE  
Washington, DC 20426

***Re: Ratepayers Urge FERC to Exercise Their Jurisdiction to the Fullest Extent to Increase Electricity Transmission Affordability***

Dear FERC Commissioners:

The 105 organizations that have signed onto this letter and are listed below urge you to fully exercise your authority to reduce the cost of electricity transmission and increase affordability by unleashing competition to the largest extent possible in the regulated electric utility industry. The request is consistent with President Trump's pledge to reduce electricity prices and his Executive Order "Reducing Anti-Competitive Regulatory Barriers."<sup>1</sup>

Transmission costs are escalating across the country. For example, in PJM our largest RTO, transmission costs have increased from 6.8 percent to 32 percent of the wholesale price from 2014 to 2024. A 470 percent increase in a time when demand was essentially flat. PJM, MISO, and SPP consumers have long been advocating for more reforms on cost overruns for long-range projects.<sup>2</sup> Consumers are subjected to excessive transmission charges, including for projects where benefits no longer exceed the costs and for projects that may not even become used and useful. Too many transmission projects enjoy a presumption of prudence that costs are prudently incurred and receive incentives that often result in ROEs of 10-13 percent. FERC has failed to include necessary cost containment requirements.<sup>3</sup>

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<sup>1</sup> Reducing Anti-Competitive Regulatory Barriers, White House Executive Order, April 9, 2025, <https://www.whitehouse.gov/presidential-actions/2025/04/reducing-anti-competitive-regulatory-barriers/>

<sup>2</sup> Stakeholders Suggest Cost Overruns Ubiquitous as MISO Reviews Long-range Tx Project, RTO Insider, <https://www.rtoinsider.com/123977-stakeholders-suggest-cost-overruns-ubiquitous-miso-reviews-lrtp/>

<sup>3</sup> End Use Customer Sector Statement on Transmission Cost Containment at the December 16, 2025 Regional Expansion Criteria and Benefits Working Group (RECBWG) Special Meeting,

According to Edison Electric Institute, investor-owned electric utilities spent \$246 billion on transmission from 2017 to 2025 and will spend another \$86.1 billion in 2026 and 2027.<sup>4</sup> After financing costs are added, the actual costs to ratepayers can quadruple. For example, the MISO Tranche I 2022 estimated cost was \$10.3 billion and the projected cumulative cost by 2067 was \$42.5 billion.<sup>5</sup> Using that same assumption that costs could quadruple, EEI's projected spending of \$86.1 billion in 2026-2027 could balloon to \$344 billion over the life of the projects. To put these costs in perspective, in 2024, US consumers spent a total of \$515 billion on electricity.<sup>6</sup>

All costs are passed onto ratepayers. The decisions today will impact ratepayers for decades to come. We urge the Commission to take urgent and prudent action to protect ratepayers and stop protecting monopolies.

Sincerely,

Paul N. Cicio  
Chairman, Electricity Transmission Competition Coalition  
[pcicio@ieca-us.org](mailto:pcicio@ieca-us.org)  
703-216-7402

1. Ag Processing Inc
2. Alliance of Western Energy Consumers
3. Aluminum Association
4. American Chemistry Council
5. American Forest & Paper Association
6. American Foundry Society
7. American Iron and Steel Institute
8. Americans for Prosperity
9. Ardagh Group
10. Arglass Yamamura
11. Arkansas Electric Energy Consumers, Inc.
12. Arkansas Forest and Paper Council
13. Association of Businesses Advocating for Tariff Equity
14. Association of Western Energy Consumers (AWEC)
15. Benton Foundry
16. CalPortland Company
17. Can Manufacturers Institute
18. Cardinal Glass Industries
19. Carolina Industrial Group for Fair Utility Rates
20. Carolina Utility Customers Association, Inc.
21. Century Aluminum

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<https://cdn.misoenergy.org/20251216 RECBWG Item 02 End Use Customer Sector Comments737624.pdf>

<sup>4</sup> Edison Electric Institute Business Analytics Groups

<sup>5</sup> MISO LRTP Tranche 1: Figure A4.5 Indicative Annual Revenue Return (ARR) 6/8/22: (18 Transmission Lines)

<sup>6</sup> U.S. Energy Information Administration

22. Chemical Industry Council of Illinois
23. Chemistry Council of New Jersey
24. Coalition of MISO Transmission Customers
25. Coastal Energy Corporation
26. Commercial Metals Company
27. Conservative Energy Network
28. Conservative Texans for Energy Innovation
29. Consumers Council of Missouri
30. Council of Industrial Boilers Organization
31. Delaware Energy Users Group
32. Digital Realty
33. Divers Processing Company, Inc.
34. Domtar Corporation
35. Eramet Marietta Inc.
36. FMI - the Food Industry Association
37. Food Northwest
38. Formosa Plastics Corporation, USA
39. Foundry Association of Michigan
40. GCF | Global Cellulose Fibers
41. Gerdau Ameristeel, Inc.
42. Glass Packaging Institute
43. Indiana Cast Metals Association
44. Indiana Industrial Energy Consumers
45. Industrial Energy Consumers of America
46. Industrial Energy Consumers of Pennsylvania
47. Industrial Minerals Association-North America
48. Inland Empire Paper
49. International Paper Company
50. Iowa Business Energy Coalition
51. Iowa Industrial Energy Group, Inc.
52. Iron Mining Association of Minnesota
53. Kansas Chamber of Commerce
54. Kansas Manufacturing Council
55. Large Energy Users Coalition (NJ)
56. Lehigh Hanson, Inc.
57. Maine Industrial Energy Consumer Group
58. Marathon Petroleum Company
59. Maryland Office of People's Counsel
60. Messer Americas
61. Metalcasters of Minnesota
62. Michigan Chemistry Council
63. Midwest Food Products Association
64. Minnesota Large Industrial Group
65. Multiple Intervenors, NY
66. National Council of Textile Organizations
67. National Restaurant Association
68. National Retail Federation

69. Niskanen Center
70. North Carolina Manufacturers Alliance
71. Office of the People's Counsel for the District of Columbia
72. Ohio Cast Metals Association
73. Ohio Chemistry Technology Council
74. Ohio Energy Group
75. Ohio Energy Leadership Council
76. Ohio Manufacturers' Association
77. Oklahoma Industrial Energy Consumers
78. Olin Corporation
79. Owens-Illinois
80. PJM Industrial Customer Coalition
81. Portland Cement Association
82. Public Citizen, Inc.
83. R Street
84. Rain CII Carbon LLC
85. Resale Power Group of Iowa
86. Retail Industry Leaders Association
87. Reynolds Consumer Products LLC
88. Riceland Foods, Inc.
89. Rio Tinto
90. Skana Aluminum Company
91. South Carolina Small Business Chamber of Commerce
92. Steel Manufacturers Association
93. Sylvamo
94. SynthaGroup Inc
95. Texans for Affordable Transmission
96. Texas Cast Metals Association
97. The Fertilizer Institute
98. The John K. MacIver Institute for Public Policy, Inc.
99. TimkenSteel Corporation
100. Vallourec STAR LP
101. Vinyl Institute
102. Virginia Manufacturers Association
103. West Virginia Energy Users Group
104. Wisconsin Cast Metals Association
105. Wisconsin Industrial Energy Group