

Proactive Transmission Planning for a Clean Energy Transition

PREPARED BY

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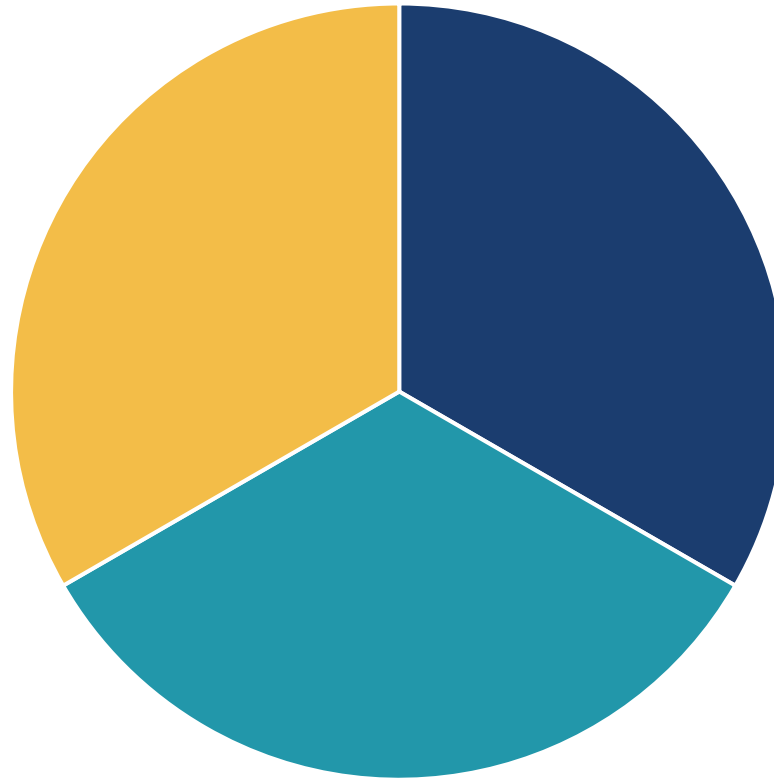
Washington, DC



Need: to double or triple existing transmission capacity!
Question: How can we do so quickly and cost-effectively?

1. Advanced, grid enhancing technologies

- Dynamic line ratings
- Flow control devices
- Topology optimization
- Grid-optimized DER/storage
- Remedial action schemes
- Grid-forming inverters



2. Upgrades of existing lines

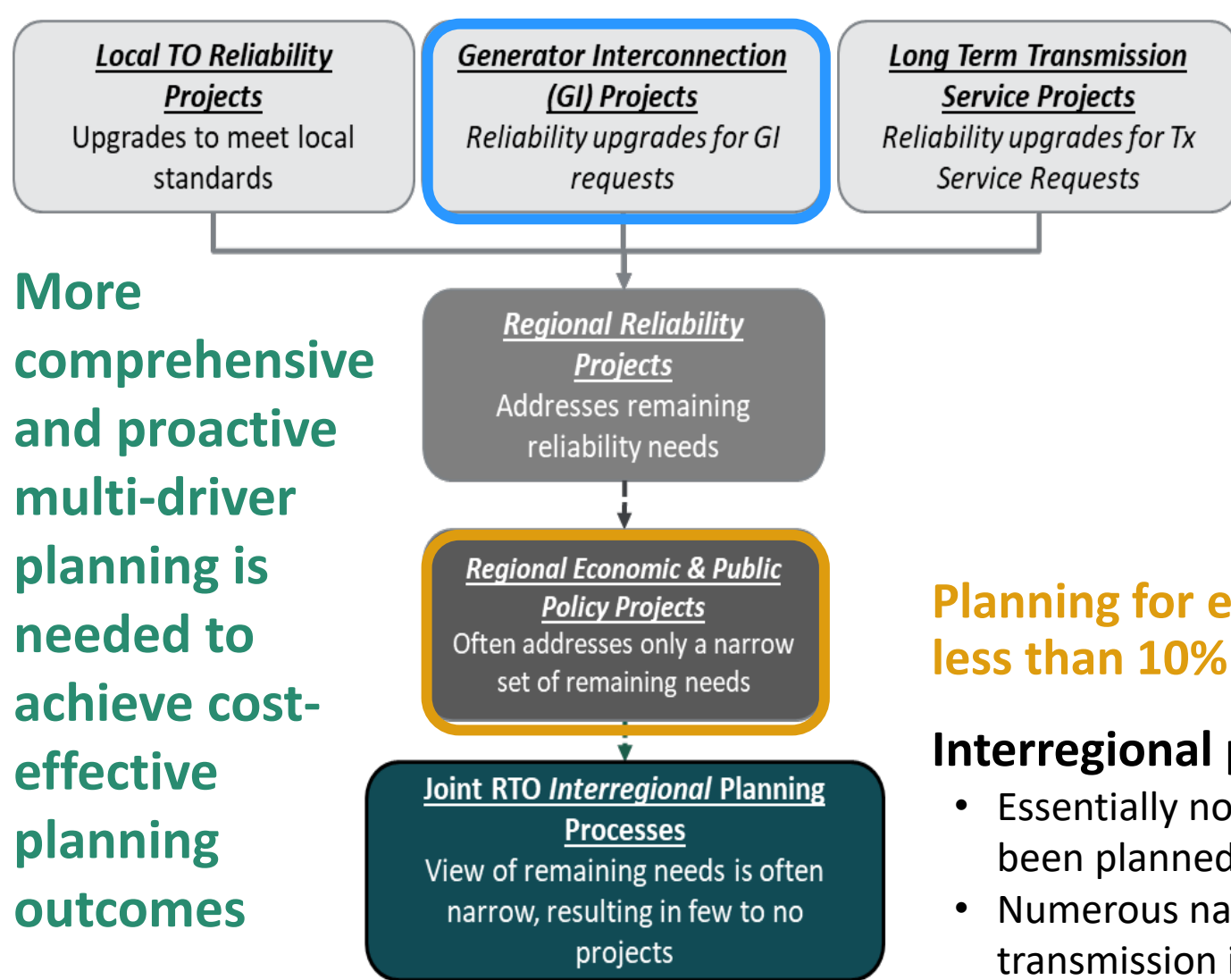
- Advanced conductors
- Rebuild aging lines at higher voltage
- Conversions to HVDC

3. New transmission

- Highway/railroad corridors
- ROW-efficient AC designs
- HVDC transmission
- Submarine/underground
- New greenfield overhead

Example: Priority order required by the German “[NOVA Principle](#)”

Siloed, reliability-focused U.S. transmission planning cannot identify the most cost-effective solutions



More comprehensive and proactive multi-driver planning is needed to achieve cost-effective planning outcomes

These solely reliability-driven processes account for > 90% of all transmission investments

- None involve any assessments of economic benefits (i.e., cost savings offered by the new transmission)

Incremental generation interconnection has become the primary tool (and efficiency barrier) to support public policy goals

Planning for economic & public-policy needs results in less than 10% of all U.S. transmission investments

Interregional planning processes are large ineffective

- Essentially no major interregional transmission projects have been planned and built in the last decade
- Numerous national studies show that more interregional transmission is needed to reduce total system costs

Solution: Proactive, Multi-Driver, Scenario-based Planning



Experience with proven transmission planning practices show they reduce total costs and mitigate risks by comprehensively addressing both near- and long-term needs:

1. Proactively plan for all future generation- and load-serving needs by incorporating realistic projections of the anticipated generation mix and locations, public policy mandates, load levels, and load profiles over the lifespan of the transmission investments
2. Use multi-driver planning and account for the full range of transmission projects' benefits and to comprehensively identify investments that cost-effectively address all categories of needs and benefits
3. Address uncertainties and high-stress grid conditions explicitly through scenario-based planning that takes into account a broad range of plausible long-term futures as well as real-world system conditions, including challenging and extreme events
4. Use comprehensive transmission network portfolios to address system needs and cost allocation more efficiently and less contentiously than under a single-driver, project-by-project approach
5. Jointly plan inter-regionally across neighboring systems to recognize regional interdependence, increase system resilience, and take full advantage of interregional scale economics and geographic diversification benefits.

Examples of Proactive, Scenario-based Planning Processes

Although still rarely used, significant experience exists with proactive, multi-driver (multi-benefit), scenario- and portfolio-based transmission planning:

	Proactive Planning	Multi-Benefit	Scenario-Based	Portfolio-Based	Interregional Transmission
CAISO TEAM (2004) ¹⁴⁶	✓	✓	✓		
ATC Paddock-Rockdale (2007) ¹⁴⁷	✓	✓	✓		
ERCOT CREZ (2008) ¹⁴⁸	✓			✓	
MISO RGOS (2010) ¹⁴⁹	✓	✓		✓	
EIPC (2010-2013) ¹⁵⁰	✓		✓	✓	✓
PJM renewable integration study (2014) ¹⁵¹	✓		✓	✓	
NYISO PPTPP (2019) ¹⁵²	✓	✓	✓	✓	
ERCOT LTSA (2020) ¹⁵³	✓		✓		
SPP ITP Process (2020) ¹⁵⁴		✓		✓	
PJM Offshore Tx Study (2021) ¹⁵⁵	✓		✓	✓	
MISO RIIA (2021) ¹⁵⁶	✓	✓	✓	✓	
Australian Examples:					
- AEMO ISP (2020) ¹⁵⁷	✓	✓	✓	✓	✓
- Transgrid Energy Vision (2021) ¹⁵⁸	✓	✓	✓	✓	✓

(See specific examples for SPP, MISO, CAISO, AEMO, and ENTSO-E in additional slides)

What is Proactive, Scenario-Based, Long-Term Planning?

Scenario-based planning is a process first developed in the 1940s and 1950s as a tool for integrating uncertainties into long-term strategic planning:

- Used by Shell with great success since the 1970s for long-term planning under large uncertainties
- **Assists planners to think, in advance, about the many ways the future may unfold and how to respond effectively and flexibly as the future becomes reality**
- Ranks among the top-ten management tools in the world today
- Scenario = one fully-defined, plausible view of what the future may look like

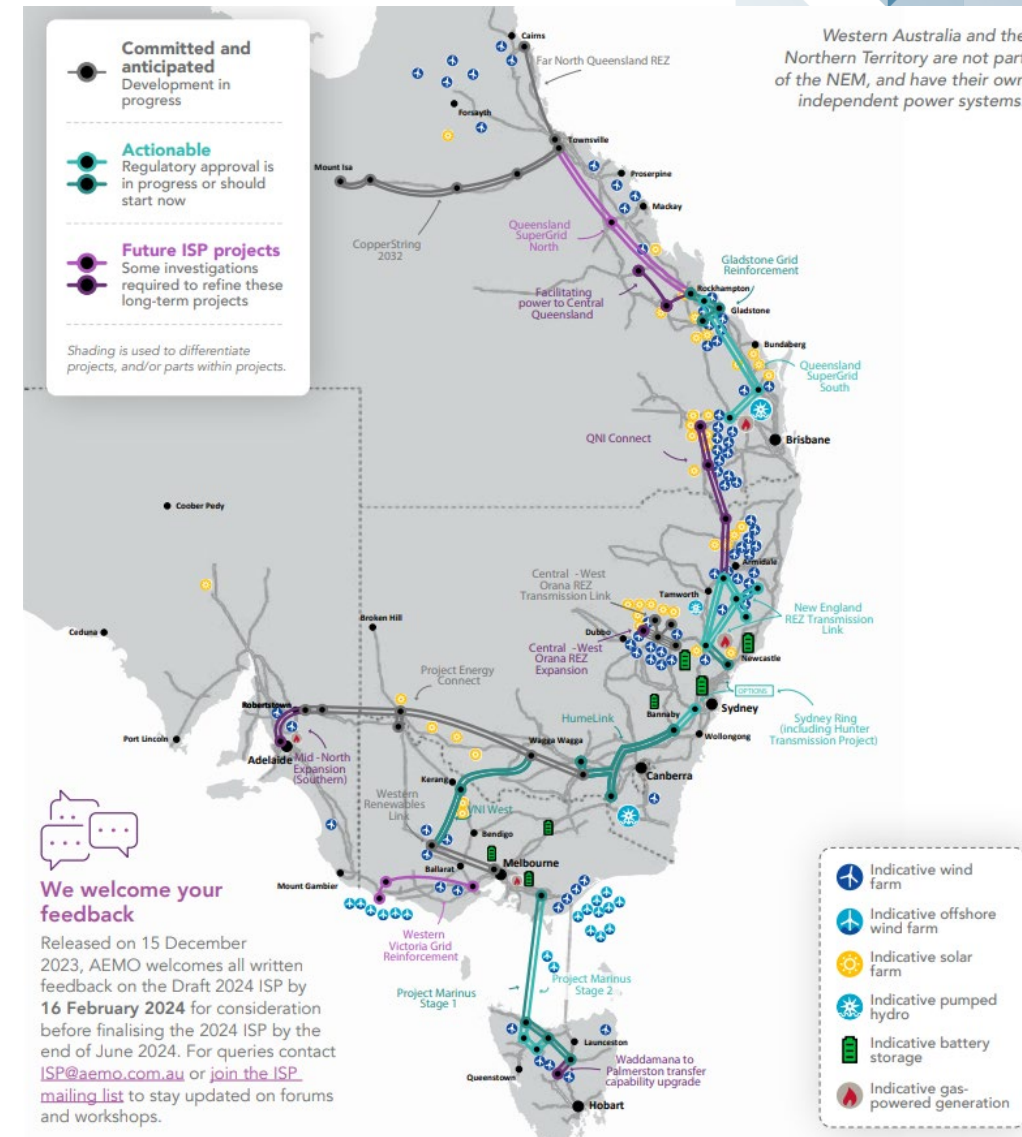
Scenario-based planning is a multi-step process:

1. Define scenarios of plausible futures by scanning the current reality, trends and forecasts, uncertainties, and important internal and external drivers
2. Develop a series of plans (initiatives, projects, policies, tactics) that support a certain scenario, work well in multiple scenarios, or are flexible and robust across all scenarios
3. Implement preferred plan and define indicators to alert planners that a certain future is likely to occur, so they can take action (e.g., change course to address the new developments)

Example 1: Australian Integrated System Plan (ISP)

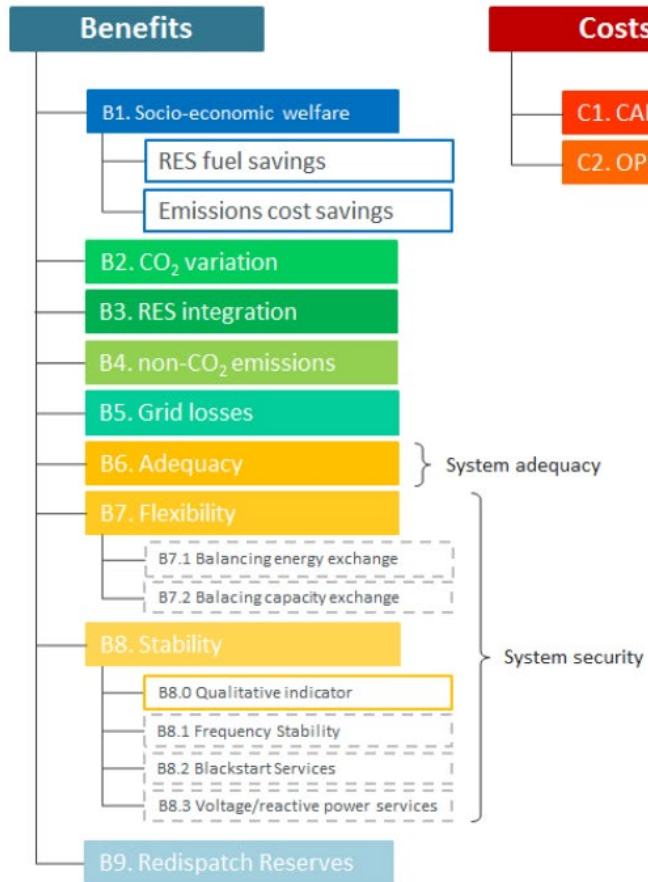
The Australian Energy Market Operator (AEMO) integrated planning process is “best in class”:

- Clearly-specified methodology ([link](#)) produces updated plans every two years with extensive stakeholder consultations (see [Draft 2024 ISP](#))
 - Scenario-based analysis explicitly considers long-term uncertainties over next 30 years ([link](#))
 - Plans distinguish: (1) actionable projects for which the need is certain enough now to move forward; and (2) future projects that are likely needed at some point
 - Least regrets planning values optionality that can be exercised if/when needed (e.g., projects that can be built/expanded in stages; or undertaking “early works” to develop shovel-ready projects that can be constructed quickly in the future)
- Guidelines for cost-benefit framework, forecasting, and “investment tests” from the Australian Energy Regulator (AER) make AEMO plans actionable ([link](#))



Example 2: European 10-year Network Development Plans

ENTSO-E: Standardized Multi-value Benefit-Cost Analysis Framework for EU-wide Transmission Planning (incl. HVDC)



Entso-E Planning and CBA framework

- Forecast-based up to 10 years
- Scenario-based for 10-30 years
- Standardized benefit-cost analysis
- Specifically addresses HVDC benefits: cost savings achievable from optimized dispatch of HVDC lines; transient, voltage, and frequency stability benefits of HVDC lines; blackstart services; voltage and reactive power support

Source: ENTSO-e, [4th ENTSO-e Guideline for Cost Benefit Analysis of Grid Development Projects](#), Oct 18, 2023, Figure 8; [TYNDP 2024 Implementation Guidelines](#), Mar 4, 2024. For a summary of the ENSTO-e framework, incl. HVDC, see pp. 77-80 [here](#).

10-Year Network Development Plan (TYNDP) to Evaluate 176 Transmission, 33 Storage Projects



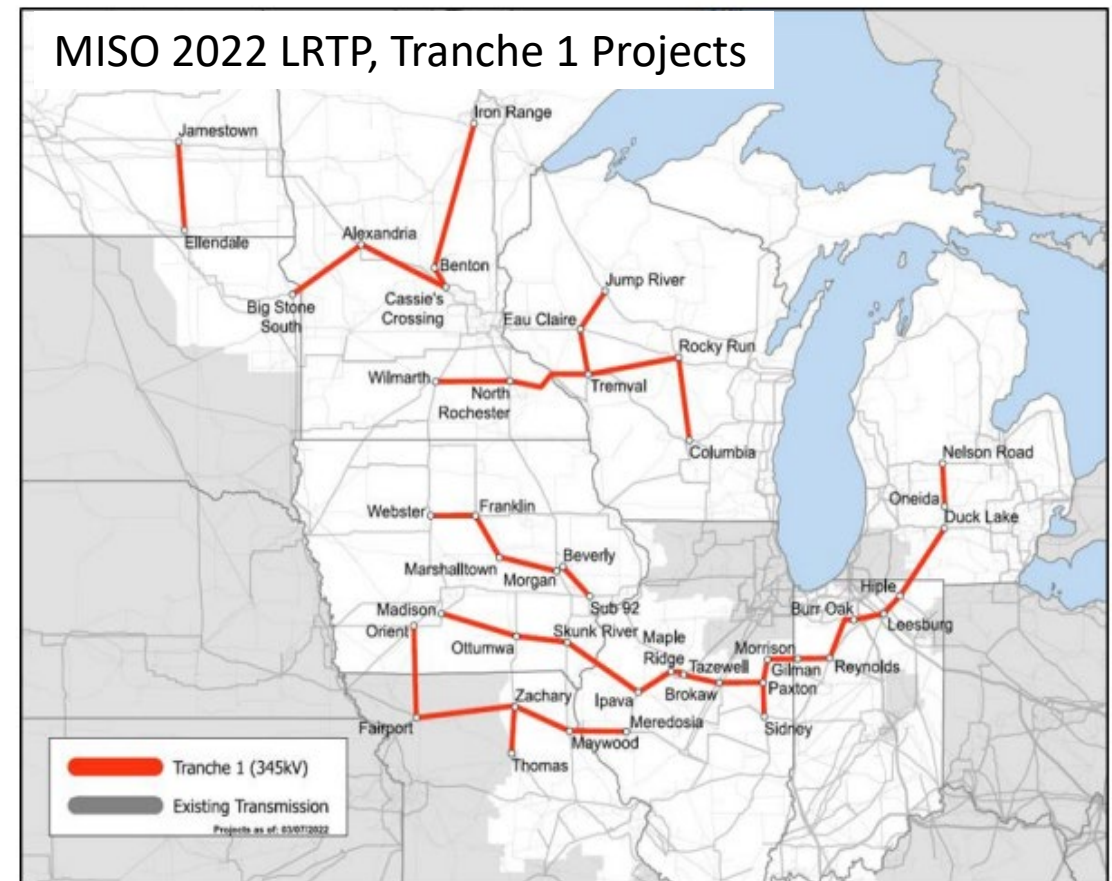
Example 3: MISO Long-Term Transmission Planning (LRTP)

Scenario-based LRTP → Several tranches of “least regrets” portfolios of multi-value transmission projects (MVPs)

MISO 2022 LRTP results

- Tranche 1: \$10 billion portfolio of proposed new 345 kV projects for its Midwestern footprint
- **Supports interconnection of 53,000 MW of renewable resources**
- **Reduces other costs by \$37-70 billion**
- Portfolio of beneficial projects designed to benefit each zone within MISO’s Midwest Subregion
- Postage-stamp cost allocation within MISO’s Midwest Subregion

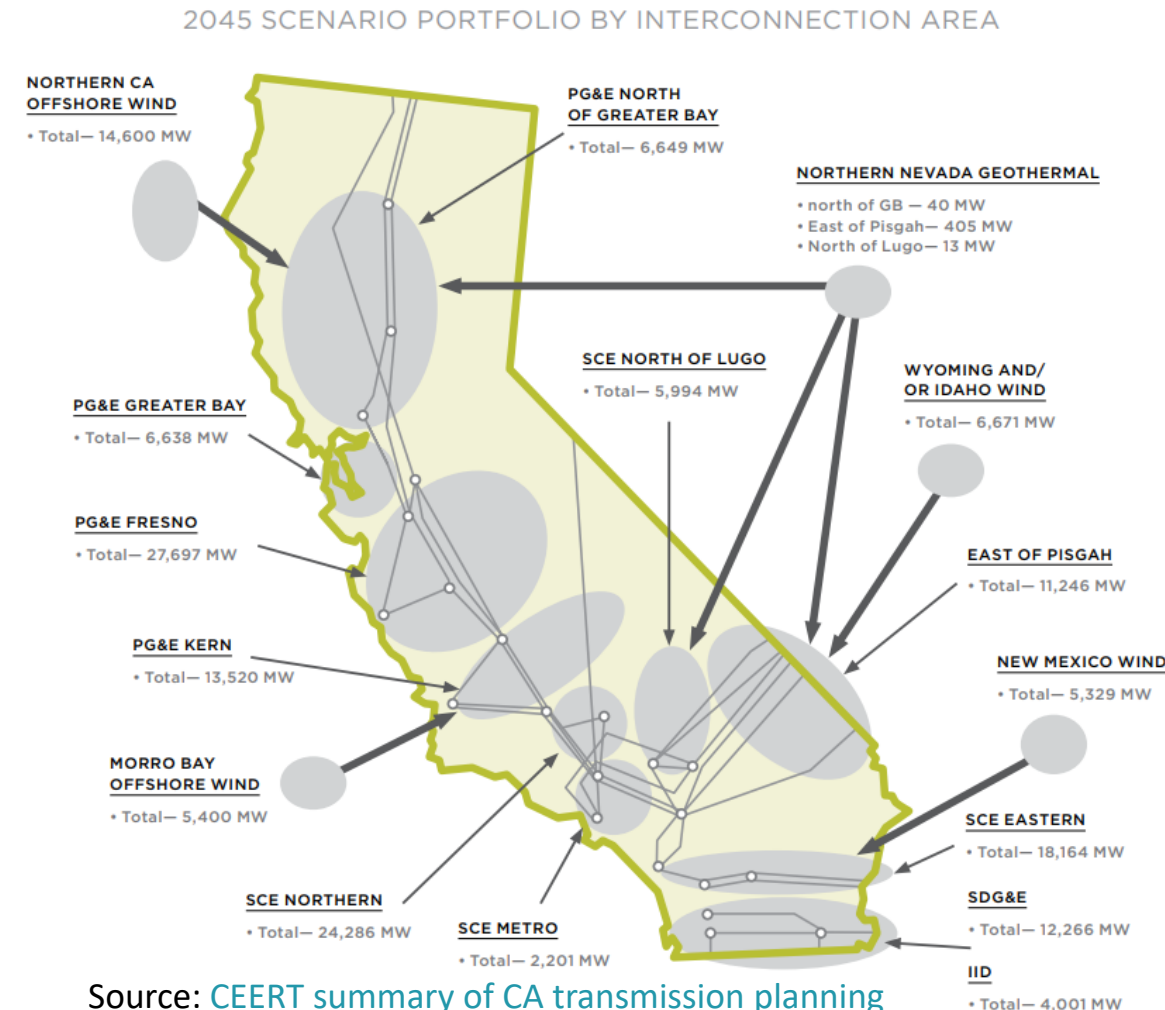
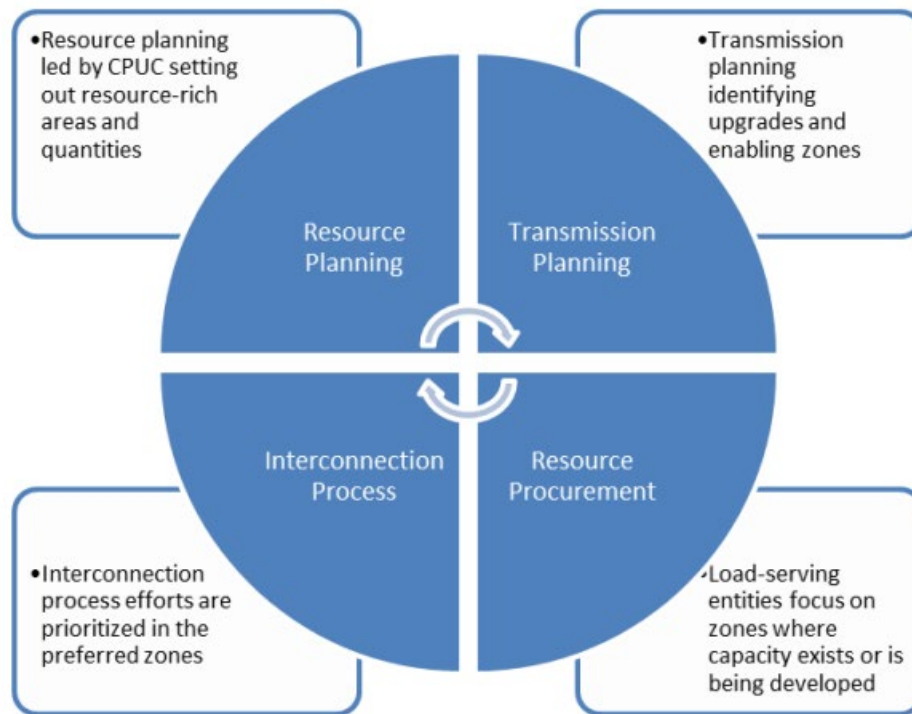
MISO is currently in the process of finalizing \$23 billion of Tranche 2 projects ([link](#))



Example 4: California's Transmission Planning Process (TPP)

California's TPP combines (1) scenario-based, zonal resource development outlooks prepared by state agencies with (2) the planning and procurement of transmission solutions by the California ISO

- See [overview](#) and board-approved [2022-2023 Plan](#)
- Improved generator interconnection process ([link](#)) offers substantial [headroom](#)

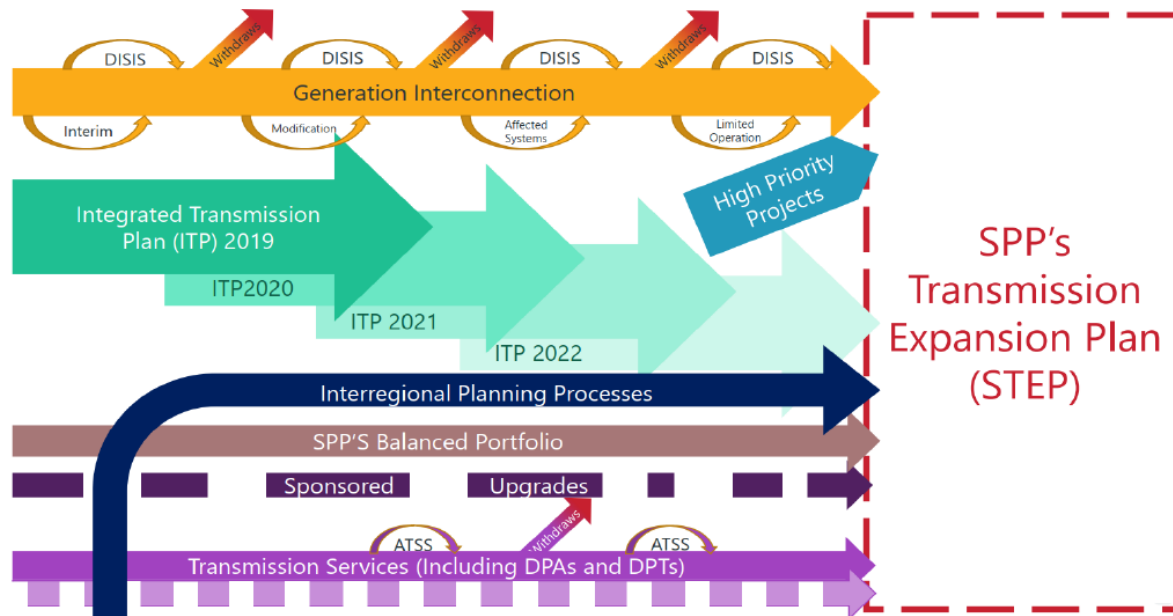


Source: [CEERT summary of CA transmission planning](#)

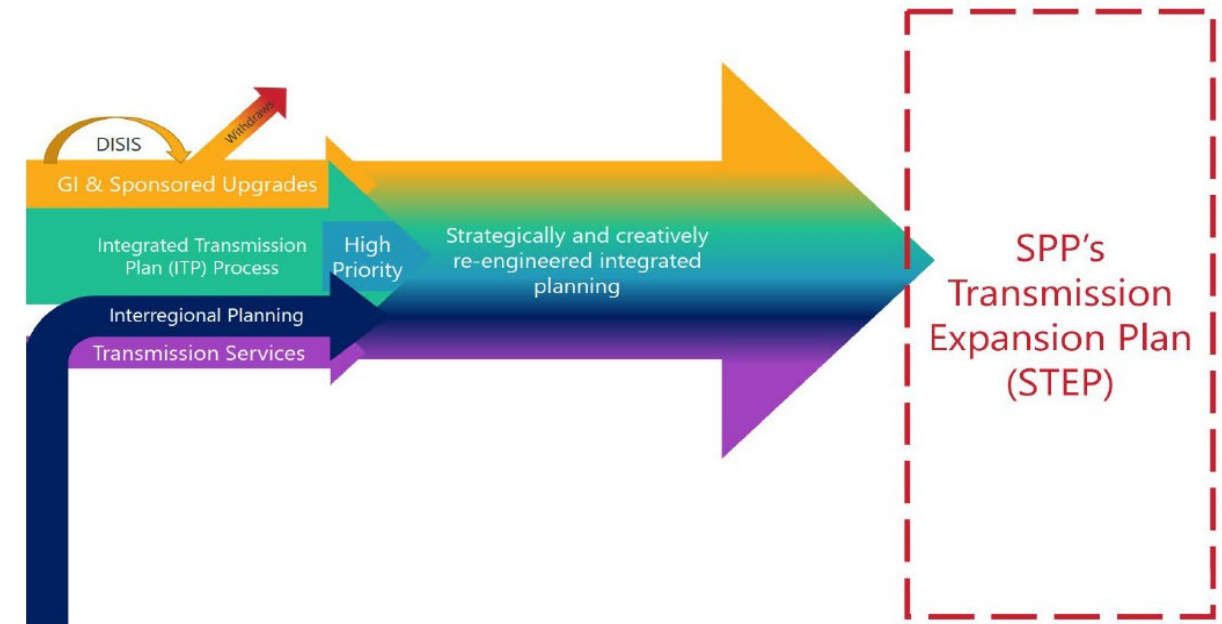
Example 5: SPP's Proposed Consolidated Planning Process (CPP)

The Southwest Power Pool (SPP) is working on consolidating its several siloed planning processes (e.g., for generator interconnection, integrated regional transmission, transmission service requests and interregion) into a single holistic process:

Current Planning Process



Proposed Consolidated Planning Process



Risk Mitigation Through Proactive “Least-Regrets” Planning



Planning processes need to consider the risk-mitigation and insurance value of transmission infrastructure:

- Given that it can take a decade to develop new transmission, delaying investment can easily **limit future options** and result in a **higher-cost, higher-risk** overall outcomes
 - “Wait and see” approaches can limit options, so can be more costly in the long term
 - The industry needs to plan for both short- and long-term uncertainties more proactively – and develop “anticipatory planning” processes that comprehensively address all future needs
- **“Least regrets” planning** needs to focus on minimize the risk of both under- and overinvesting
 - Scenario-based planning to minimize possible regrets ... must focus not only on (1) identifying projects that are beneficial under most circumstances; but also consider (2) the many “regrettable” high-cost outcomes that could result if transmission investments are not made
 - In other words: can’t just focus on the “cost” of insurance without considering the cost of not having insurance when it is needed
- Taking probability-weighted averages is insufficient as it assumes risk neutrality and cannot distinguish between plans with higher/lower risk distributions

Improving Generator Interconnection Studies and Planning



U.S. generator interconnection processes received [poor grades](#). Improving them requires addressing five elements of the interconnection processes:

1. **GI [Process](#) and Queue Management:** individual vs. cluster studies, type of studies and contractual agreements, readiness criteria, financial deposits, study and restudy sequences, etc.
2. **GI [Scope](#) and “Handoff” to Regional Transmission Planning:** are major (“deep”) network upgrades triggered by incremental generation interconnection requests or handled proactively and comprehensively through regional transmission planning?
3. **GI [Study Approach and Criteria](#):** study assumptions, modeling approaches, and specific criteria differ significantly across regions (e.g., firm/non-firm study differences, injection levels studied, are generation redispatch opportunities and “remedial action schemes” considered?)
4. **Selecting [Solutions](#) to Address the Identified Criteria Violations:** most regions select only traditional transmission upgrades to address criteria violations; grid-enhancing technologies (such as power-flow-control devices or dynamic line ratings) often are not seriously considered and accepted
5. **[Cost Allocation](#):** most U.S. regions require the interconnecting generator (or group of generators) to pay for all upgrades identified, even though (a) there may be significant regional benefits to loads and other market participants and (b) more cost effective (multi-value) regional solutions may exist

Options for Improving the Generator Interconnection Process

Reducing the scope of network upgrades triggered by generator interconnections is necessary to both accelerate and lower the cost of renewable integration:

- Attractive: UK “Connect and Manage” (replaced prior “Invest and Connect”)
 - Similar to ERCOT; reduced lead times by 5 years; network constraints addressed later (e.g., with congestion management)
<https://www.gov.uk/guidance/electricity-network-delivery-and-access#connect-and-manage>
- ERCOT’s generation interconnection process is perhaps most effective in the U.S.
 - Efficient handoff of study roles by ERCOT and Transmission Owners limits restudy needs
 - Projects can be developed and interconnected within 2-3 years; in other regions, the interconnection study process itself may take longer than that
 - Upgrades focused only on local interconnection needs and are recovered through postage stamp
 - Network constraints managed through market dispatch – which imposes high congestion and curtailment risks on interconnecting generators ... in part due to ERCOT’s insufficiently proactive multi-value grid planning
 - See Enel [working-paper.pdf \(enelgreenpower.com\)](#) [Note: Brattle was not involved]

Generation interconnection based on “connect and manage” when combined with proactive transmission planning offers more timely and cost-effective solutions if:

- Near-term needs are quickly addressed through multi-value planning (beyond reliability)
- Long-term needs are proactively and comprehensively addressed through scenario-based planning

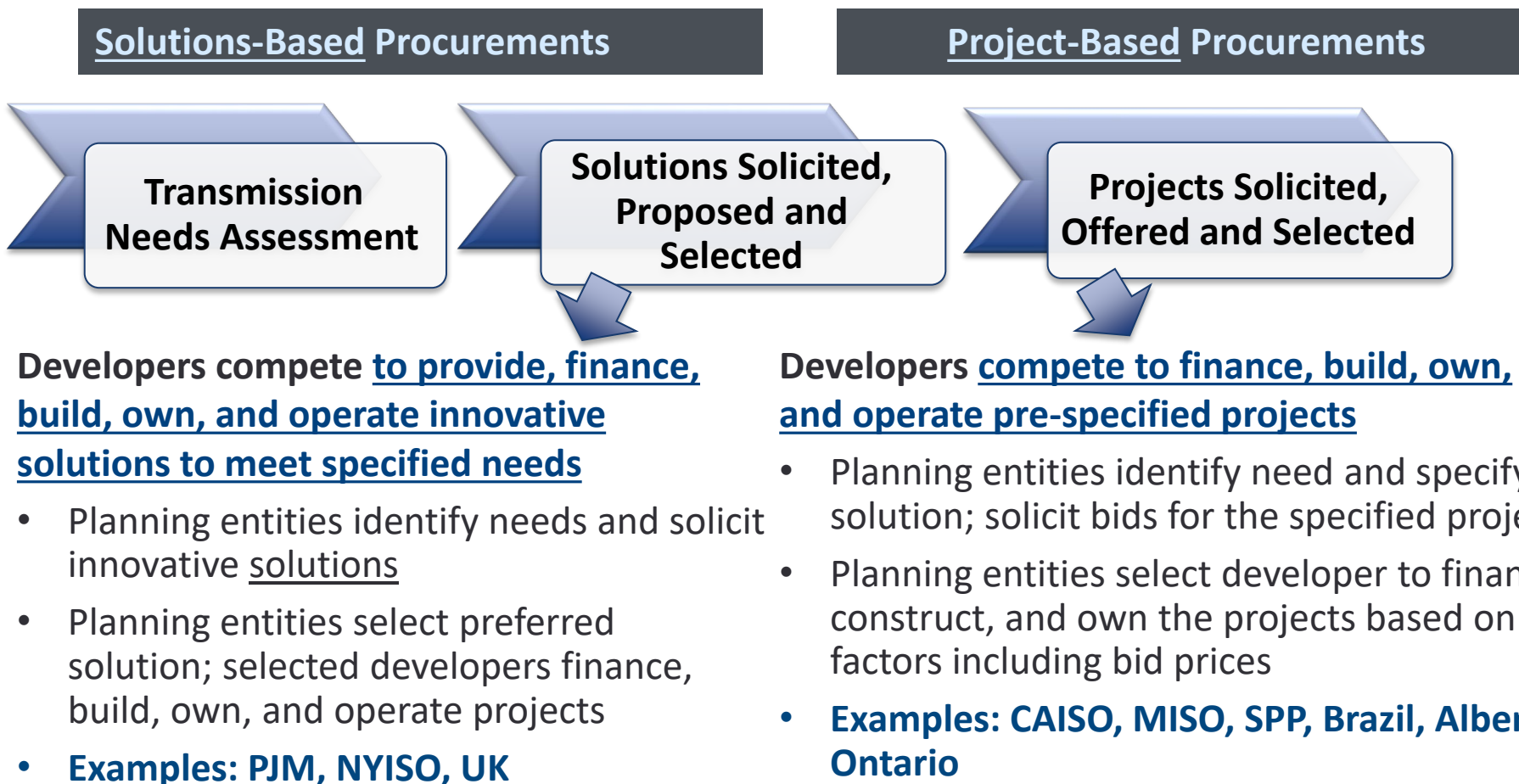
Options for Interconnecting Resources More Quickly and Effectively

With FERC Order 2023 guidance and emerging best practices from other regions, the following measures can add resources more quickly and cost-effectively:

1. Implement fast-track process for sharing and transfers of existing POIs
2. Identify existing “headroom” at possible POIs
3. Fast-track new POIs for “first-ready” projects
4. Allow for GETs and (simple) RAS/SPS to address interconnection needs
5. Simplify ERIS (energy-only) interconnections with option to upgrade to NRIS (capacity) later
6. Proactively and holistically plan for long-term transmission needs
7. Speed up state & local permitting for projects with signed interconnection service agreements ([PJM blog](#): 44+ GW with ISAs yet only 2 GW brought online in 2022)

Competitive Procurements: Innovation and Reduced Costs

In the U.S., FERC's Order No. 1000 was intended to promote “more efficient or cost-effective transmission development” through competitive procurements



Several [studies](#) of competitive procurements in the U.S., Canada, U.K., and Brazil show that competitive solicitations yield **more innovative solutions** and **cost savings of 20-30%**, yet less than 5% of projects are subject to competitive procurements

Advanced Grid Technologies: Fast and Cost-effective Solutions

Advanced and grid-enhancing transmission (GET) technologies can (1) significantly and quickly increase the capability of the existing grid, (2) offer low-cost solutions to address near-term reliability needs, and (3) also make new transmission more valuable and cost effective in the long-term

- Increasingly well-tested and commercially-applied technologies include: dynamic line rating, smart wires and flow control devices, grid-optimized storage, and topology optimization
- Can be deployed quickly to integrate renewables on the existing grid (see Chapter III of [NY Power Grid Study](#))
- [Brattle case study in SPP](#): DLR, topology optimization, and advanced power-flow controls can integrate 2,670 MW of renewable generation for \$90 million
- Value proposition: more visibility of actual grid capability; shift flows to underutilized portions of the grid

Consideration of GETs needs to be expanded beyond addressing operational and seam-related reliability and congestion needs – GETs should be part of the standard set of available solutions to address generation interconnection and both short- and long-term transmission planning needs

- As low-cost solutions to address reliability needs identified in generation interconnection and near-term planning
- In long-term multi-value planning to make new transmission more cost effective and valuable, reducing system-wide costs
- Consider European experience: [NOVA-Principle](#) and [CurrENT's report](#)

The Bottom Line: Necessary Improvements



Integrating generation interconnection into comprehensive, more pro-active transmission planning processes will be necessary

- More cost-effective, holistic solutions can be identified to address the wide range of future needs
- The costs and time required to interconnect the large number of resources necessary to meet clean-energy goals can be reduced dramatically

The benefits of proactive planning increase for planning processes that:

1. Consider generation needs over longer time frames (i.e., a decade of already known resource needs, as opposed to one resource or one class year at a time) and improve generator interconnection study criteria
2. Reduce the scope of network upgrades triggered by generation interconnection through more integrated, proactive transmission planning that simultaneously considers multiple needs (generator interconnection, local and regional reliability, economic benefits, and public policy needs)
3. Use proactive multi-value planning processes to address both urgent near-term needs and long-term needs
4. Look beyond regional seams to identify more cost-effective interregional solutions to the range of identified transmission needs (and minimize the scope of and uncertainties associated with “affected system studies”)
5. Rely on advanced transmission technologies to address identified needs
6. Utilize pragmatic cost allocations that are roughly commensurate with benefits received



Thank You!

About the Speakers



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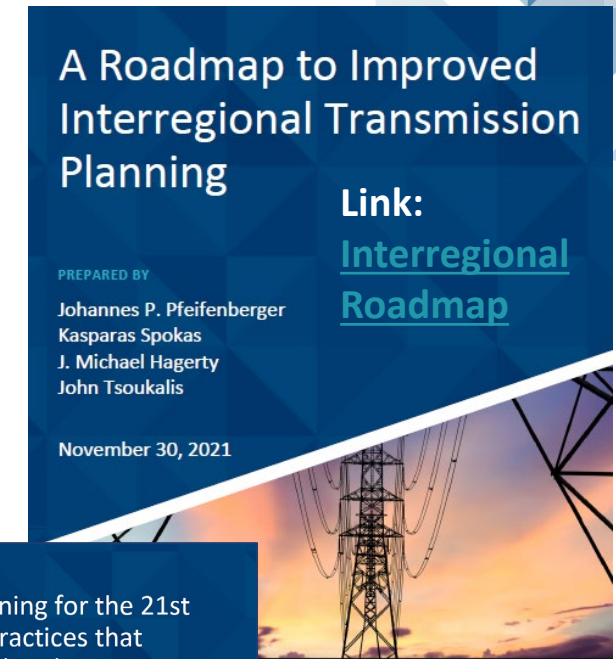
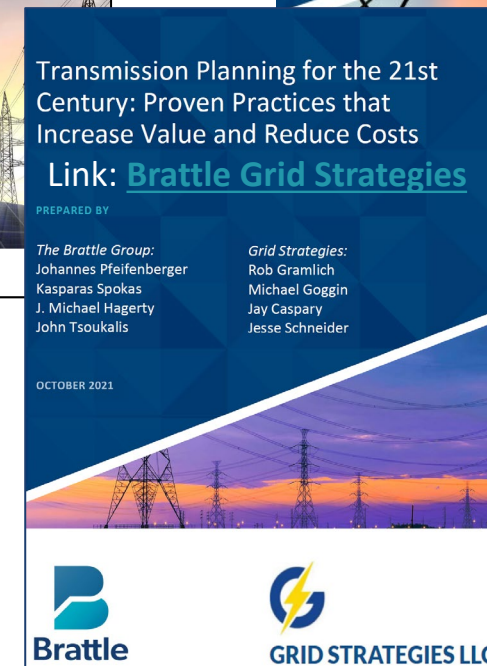
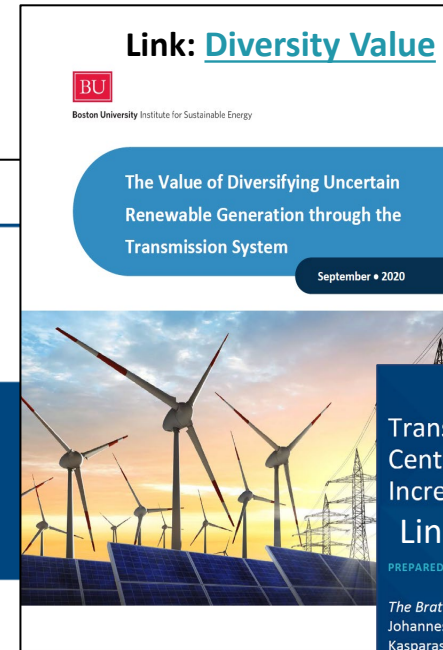
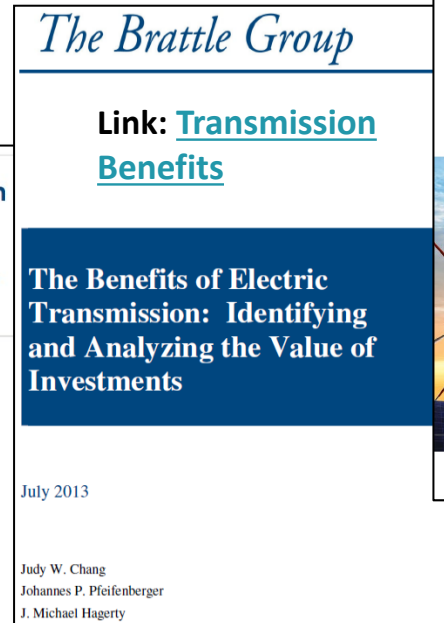
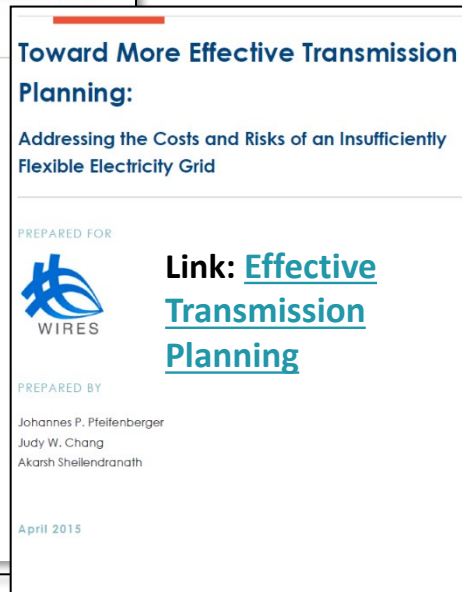
([webbio and publications](#))

Johannes (Hannes) Pfeifenberger, a Principal at The Brattle Group, is an economist with a background in electrical engineering and over twenty-five years of experience in wholesale power market design, renewable energy, electricity storage, and transmission. He also is a Visiting Scholar at MIT's Center for Energy and Environmental Policy Research (CEEPR), a former Senior Fellow at Boston University's Institute of Sustainable Energy (BU-ISE), a IEEE Senior Member, and currently serves as an advisor to research initiatives by the U.S. Department of Energy, the National Labs, and the Energy Systems Integration Group (ESIG).

Hannes specializes in wholesale power markets and transmission. He has analyzed transmission needs, transmission benefits and costs, transmission cost allocations, and renewable generation interconnection challenges for independent system operators, transmission companies, generation developers, public power companies, industry groups, and regulatory agencies across North America. He has worked on transmission matters in SPP, MISO, PJM, New York, New England, ERCOT, CAISO, WECC, and Canada and has analyzed offshore-wind transmission challenges in New York, New England, and New Jersey.

He received an M.A. in Economics and Finance from Brandeis University's International Business School and an M.S. and B.S. ("Diplom Ingenieur") in Power Engineering and Energy Economics from the University of Technology in Vienna, Austria.

Examples of Brattle Reports on Regional and Interregional Transmission Planning and Benefit-Cost Analyses



Summarizes proven approaches to quantifying various benefits

“Checklist” of Transmission Benefits With Proven Practices for Quantifying Them

We have documented in our recent [report](#) (filed with ANOPR comments), available proven practices:

1. Consider for each project (or synergistic portfolio of projects) the full set of benefits transmission can provide (see table)
2. Identify the benefits that plausibly exist and may be significant for that particular project or portfolio; then
3. Focus on quantifying those benefits

(See our [recent report](#) with Grid Strategies for a summary of quantification practices)

Benefit Category	Transmission Benefit
1. Traditional Production Cost Savings	Adjusted Production Cost (APC) savings as currently estimated in most planning processes
2. Additional Production Cost Savings	i. Impact of generation outages and A/S unit designations
	ii. Reduced transmission energy losses
	iii. Reduced congestion due to transmission outages
	iv. Reduced production cost during extreme events and system contingencies
	v. Mitigation of typical weather and load uncertainty, including the geographic diversification of uncertain renewable generation variability
	vi. Reduced cost due to imperfect foresight of real-time system conditions, including renewable forecasting errors and intra-hour variability
	vii. Reduced cost of cycling power plants
	viii. Reduced amounts and costs of operating reserves and other ancillary services
	ix. Mitigation of reliability-must-run (RMR) conditions
	x. More realistic “Day 1” market representation
3. Reliability and Resource Adequacy Benefits	i. Avoided/deferred cost of reliability projects (including aging infrastructure replacements) otherwise necessary
	ii. (a) Reduced loss of load probability or (b) reduced planning reserve margin
4. Generation Capacity Cost Savings	i. Capacity cost benefits from reduced peak energy losses
	ii. Deferred generation capacity investments
	iii. Access to lower-cost generation resources
5. Market Facilitation Benefits	i. Increased competition
	ii. Increased market liquidity
6. Environmental Benefits	i. Reduced expected cost of potential future emissions regulations
	ii. Improved utilization of transmission corridors
7. Public Policy Benefits	Reduced cost of meeting public policy goals
8. Other Project-Specific Benefits	Examples: increased storm hardening and wild-fire resilience, increased fuel diversity and system flexibility, reduced cost of future transmission needs, increased wheeling revenues, HVDC operational benefits

Brattle Group Publications on Transmission

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Pfeifenberger, Bay, et al., [The Need for Intertie Optimization: Reducing Customer Costs, Improving Grid Resilience, and Encourage Interregional Transmission](#), October 2023.

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Pfeifenberger, DeLosa, et al., [The Benefit and Urgency of Planned Offshore Transmission](#), for ACORE, ACP, CATF, GridLab, and NRDC, January 24, 2023.

Brattle and ICC Staff, [Illinois Renewable Energy Access Plan: Enabling an Equitable, Reliable, and Affordable Transition to 100% Clean Electricity for Illinois](#), December 2022.

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Pfeifenberger, [21st Century Transmission Planning: Benefits Quantification and Cost Allocation](#), for NARUC members of the Joint Federal-State Task Force on Electric Transmission, January 19, 2022.

Pfeifenberger, Spokas, Hagerty, Tsoukalis, [A Roadmap to Improved Interregional Transmission Planning](#), November 30, 2021.

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Pfeifenberger et al., [Initial Report on the New York Power Grid Study](#), prepared for NYPSC, January 19, 2021.

Van Horn, Pfeifenberger, Ruiz, ["The Value of Diversifying Uncertain Renewable Generation through the Transmission System,"](#) BU-ISE, October 14, 2020.

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Tsuchida and Ruiz, ["Innovation in Transmission Operation with Advanced Technologies,"](#) T&D World, December 19, 2019.

Pfeifenberger, ["Cost Savings Offered by Competition in Electric Transmission,"](#) Power Markets Today Webinar, December 11, 2019.

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Brattle Group Practices and Industries

ENERGY & UTILITIES

Competition & Market
Manipulation
Distributed Energy
Resources
Electric Transmission
Electricity Market Modeling
& Resource Planning
Electrification & Growth
Opportunities
Energy Litigation
Energy Storage
Environmental Policy, Planning
and Compliance
Finance and Ratemaking
Gas/Electric Coordination
Market Design
Natural Gas & Petroleum
Nuclear
Renewable & Alternative
Energy

LITIGATION

Accounting
Analysis of Market
Manipulation
Antitrust/Competition
Bankruptcy & Restructuring
Big Data & Document Analytics
Commercial Damages
Environmental Litigation
& Regulation
Intellectual Property
International Arbitration
International Trade
Labor & Employment
Mergers & Acquisitions
Litigation
Product Liability
Securities & Finance
Tax Controversy
& Transfer Pricing
Valuation
White Collar Investigations
& Litigation

INDUSTRIES

Electric Power
Financial Institutions
Infrastructure
Natural Gas & Petroleum
Pharmaceuticals
& Medical Devices
Telecommunications,
Internet, and Media
Transportation
Water

Our Offices

