May 25, 2017

Brian Vaughan McCormack
Chief of Staff, Office of the United States Secretary of Energy
Room 7A-257
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Mr. McCormack,

On behalf of the more than 31,000 members of the National Society of Professional Engineers, I would like to provide comments in response to Secretary Perry’s April 14, 2017, memorandum on examining electricity markets and reliability. In the memo, Secretary Perry directs you “to initiate a study to explore critical issues central to protecting the long-term reliability of the electric grid, using the full resources and relationships available to the Department.” NSPE and the professional engineers we represent believe that to protect the long-term reliability of the electric grid, professional engineers must be involved in its planning, design, development, implementation, operation and, evaluation of resiliency.

NSPE supports a balanced approach to domestic energy development and delivery that safely, reliably, and efficiently minimizes the nation’s reliance on foreign sources. The objective of this approach is to provide reliable and cost-effective energy while protecting the public health, safety, and welfare, considering the full life-cycle costs and environmental impacts of all energy sources. NSPE advocates for the inclusion of professional engineers in the development and execution of this approach in all engineering aspects of (1) energy production, including mining, petroleum product extraction, fuel storage, electricity generation, and waste management; (2) energy delivery, including pipelines, ground transportation, and electric infrastructure; and (3) energy conservation and efficiency. These critical elements should be included in the study, particularly because the grid’s performance and operation is just as dependent on the delivery infrastructure as it is on the generation sources. Therefore, the electric grid cannot be evaluated in isolation without first determining the nation’s approach to electricity generation, as baseload fossil fuel, intermittent fossil fuel, and renewable energy generation resources all impact the operation of the electric grid differently, and professional engineers must be a part of this evaluation. For your reference, I have attached NSPE’s Position Statement 1776: Unified Energy Policy.

NSPE appreciates this opportunity to provide comment. Please contact Arielle Eiser, senior manager of government relations, at aeiser@nspe.org, with any questions or comments.

Sincerely,

Kodi Jean Verhalen, P.E., Esq., F.NSPE
President