



**INTERNATIONAL
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Secretary-Treasurer

October 23, 2017

Federal Energy Regulatory Commission
Office of the Secretary
888 First Street, NE
Washington, DC 20426

Re: Proposed Grid Resiliency Pricing Rule, RM 18-1-000

Dear Secretary Bose:

On behalf of the 750,000 active members and retirees of the International Brotherhood of Electrical Workers (IBEW), I write in support of the Department of Energy's (DOE) "Grid Resiliency Pricing Rule." I respectfully ask that the Federal Energy Regulatory Commission (FERC) move forward with this proposed rule as soon as possible.

The IBEW represents workers employed in a variety of fields directly and indirectly related to power generation and the electric grid. Our experience spans over 125 years. We are the best trained, most professional workforce in the electrical industry. Many of the plants that would be impacted by this proposal are IBEW built, run, and maintained. IBEW members and their employer utilities will be directly impacted by your action on this proposed rule.

In May of this year I wrote to the DOE in support of its electric grid reliability study. In that letter, I expressed the IBEW's concern that baseload power, specifically coal and nuclear generated power, is threatened by premature plant closures. These closures are a result of several things including renewable mandates and subsidies, environmental regulations, and low natural gas prices. I am pleased that the DOE's study highlighted the importance of fuel secure generation. The Grid Resiliency Pricing Rule takes in to account and provides for appropriate compensation for generation sources that have on-site fuel supplies. On-site fuel supply is critical as these plants are not subject to infrastructure attacks or supply chain disruption due to extreme weather. The DOE proposal is the first step toward ensuring the United States maintains a safe, diverse energy mix that will meet future consumer demand.

In addition to meeting consumer demand, baseload power plants provide thousands of jobs and economic stability in their communities. For actual examples of the impact these plants have on communities and IBEW members, I encourage you to review the comments submitted by many IBEW local unions in Ohio and Pennsylvania. Many of the comments from IBEW local unions give real examples of how many jobs are at risk and the substantial ripple impact the loss of those jobs would have.

The changes proposed by the Grid Resiliency Pricing Rule are a part of market evolution and are necessary. On behalf of the IBEW I encourage FERC to move forward with adoption of the proposal. I look forward to continuing to work together to ensure the reliability of the electric grid.

Sincerely yours,

Lonnie R. Stephenson
International President

LRS:mlm

