

May 15, 2025

Representative Julie Fedorchak 1607 Longworth House Office Building Washington, DC 20515

Dear Representative Fedorchak,

On behalf of the National Association of State Energy Officials (NASEO), thank you for the opportunity to respond to the Request for Information for the AI and Energy Working Group. NASEO represents the 56 State Energy Offices from every state and territory, and our members are committed to ensuring that all American consumers and businesses has access to reliable and affordable energy. State Energy Offices work on a range of energy actions for their governors, such as:

- Supporting the development of energy resources fuels and grid and innovative technologies to lower energy costs;
- Streamlining grid planning to more rapidly and cost effectively add power to the grid and expand or upgrade transmission where necessary;
- Preparing for and responding to energy emergencies resulting from natural disasters, cybersecurity incidents, and physical threats to the energy system;
- Exploring options to produce and process more critical minerals and related materials in the United States;
- Bolstering U.S. manufacturing of critical energy supply chain products;
- Supporting manufacturers' and businesses' energy needs; and
- Delivering cost-effective energy efficiency options to help lower energy costs.

State Energy Offices in coordination with economic development agencies and the private sector are key to accelerating permitting and building energy-related AI infrastructure. State Energy Offices deliver on-the-ground expertise with unique state and local energy market and policy knowledge to address complex energy opportunities. Most State Energy Offices advance a range of energy sources, and their generally non-regulatory responsibilities uniquely position them to forge public-private partnerships with the federal government, businesses, utilities, local governments, and tribal nations to help build energy-related AI infrastructure. A critical link in states' development of reliable energy resources is the U.S. State Energy Program which provides formula funding to the states to address energy priorities set by their governors and Congress. This longstanding program, administered by the U.S. Department of Energy (DOE), focuses on energy security, grid planning, efficiency, and innovation.

State Energy Offices are at the forefront of deploying next-generation energy solutions for AI data centers to improve system operations and reliability. For example, to support these objectives, NASEO and a geographically diverse group of 11 State

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Energy Offices launched the Advanced Nuclear First Mover Initiative in February 2025. This Initiative has the commitment of each governor from Indiana, Kentucky, Louisiana, Maryland, New York, Pennsylvania, Tennessee, Utah, Virginia, West Virginia, and Wyoming. These states are taking coordinated, strategic actions to reduce financial and technology risks, streamline permitting, address supply chain needs, and develop state-federal-private financing structures. Under the Initiative, states aim to deliver firm, clean, reliable nuclear power at a faster pace while emphasizing affordability.

States across the country, especially in the west, are also accelerating the development of geothermal power. The western governors on a bipartisan basis, working through their State Energy Offices, are identifying sites and reducing permitting delays. Interconnection of these sites is critical and regional transmission facilities can play a significant role in accelerating the development of this resource. State Energy Offices across the country are working together and in coordination with private developers and utilities to bring new generation resources to the grid in support of growing energy-intensive industries that are essential to America's economy and national security.

State Energy Offices are supporting such strategic actions as streamlined permitting, planning, site banking; coordination with the DOE Office of Electricity and the North American Electric Reliability Corporation; interaction with the Federal Energy Regulatory Commission; and coordination with utility commissions, utilities, economic development agencies, developers, consumers and businesses to support a more robust and affordable transmission and distribution system, which is critical for the support of AI infrastructure and America's national security.

NASEO recommends the following to the AI and Energy Working Group:

- Support Continued State-Federal Collaboration. Robust funding for the U.S. State Energy Program enhances states' efforts to innovate, support private-sector development of critical energy technologies such as advanced nuclear, grid-scale storage, U.S.-made transformers and turbines, and enhanced geothermal energy to provide power to AI energy-related infrastructure.
- Speed Infrastructure Permitting and Deployment. Streamlining siting and approval processes for both traditional and emerging generation resources—along with necessary transmission investments—is essential to delivering reliable, affordable electricity. To expedite permitting processes, consider establishing a DOE-State Energy Office-Private Sector working group comprised of relevant states that have their governors' support in exploring expediting permitting, multi-agency and utility coordination, and how to support the implementation of the *Executive Order on Updating Permitting Technology for the 21st Century*.
- Enact the SECURE Grid Act. The bill sponsored by Chairman Latta and Representative Matsui will strengthen physical and cyber security and includes transmission and distribution enhancing initiatives.

Thank you for the opportunity to offer our input regarding the work of the AI and Energy Working Group to advance the nation's critical AI data center build out and operation.

Best regards,

David Terry, President, NASEO