

September 25, 2026

Morteza Farajian, Ph.D.
Executive Director, Build America Bureau
U.S. Department of Transportation
Docket Operations, West Building 5th Floor, Room W58-213
1200 New Jersey Avenue SE, Washington, DC 20590

RE: Comments for U.S. DOT's Request for Information on America's Great Corridors of Commerce [Docket No.: DOT-OST-2026-3269]

Dear Dr. Farajian,

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit comments in response to the U.S. Department of Transportation's (U.S. DOT) America's Great Corridors of Commerce (AGCC) Request for Information (Docket No.: DOT-OST- 2026-3269). NASEO represents the 56 governor-designated State and Territory Energy Offices from across the nation. State Energy Offices lead a range of energy policy, planning, and program actions covering all energy sectors. These offices are tasked by their governors with helping to support economic growth and facilitate private-sector investments that deliver affordable, reliable, sustainable energy solutions.

Advancing innovative energy infrastructure siting and permitting options to meet state energy policy goals and surging electricity and other energy demands, is a priority in every state. In fact, NASEO's top national policy priority is federal permitting reform aimed at opening new opportunities for states and the private sector to more rapidly modernize our energy system. Because most State Energy Offices prepare comprehensive state energy plans that examine the opportunities and interdependencies of various energy sources and infrastructure, they offer expertise that would contribute greatly to U.S. DOT's proposed AGCC public-private voluntary approach. With the above in mind, NASEO offers the following recommendations:

NASEO encourages U.S. DOT to explicitly incorporate State Energy Offices as required participants in AGCC discussions, screening criteria, and the designation process itself. The availability of transportation right of way (ROW) does not necessarily correspond with the locations where new energy infrastructure will provide the greatest system value or effectiveness and spans both regulated and unregulated energy markets. U.S. DOT should make early coordination among transportation organizations and State Energy Offices a central component of the AGCC program. State Energy Offices work to advance their governor's policy priorities; have significant energy market expertise; maintain relationships with investor, municipal, and consumer-owned electric and natural gas utilities; and engage with state economic and environmental regulators, regional transmission organizations, fuel providers, and public-private investment authorities. State Energy Offices can also be tapped to help assess a proposed corridor's energy system colocation feasibility, alignment with state energy policies, and relative value in speeding delivery of energy (fuels and grid), lowering costs, and increasing system reliability. Importantly, significant portions of energy infrastructure are not within state economic regulated structures and require collaborative, public-private (P3) approaches which are the hallmark of many State Energy Offices.

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NASEO encourages U.S. DOT to specify State Energy Offices as required consultees for applicants at each stage of the process. Requiring AGCC applicants to demonstrate State Energy Office engagement as part of the "stakeholder support" and "corridor readiness" screening criteria referenced in Section IV would ensure AGCC designations reflect a state's actual energy strategy and infrastructure priorities, strengthen the durability of the P3 arrangements over their 30–50-year terms, and reduce the risk of jurisdictional conflict between transportation and energy regulatory processes as corridors are developed and scaled.

NASEO requests clarification regarding whether U.S. territories are eligible to participate fully in AGCC. We encourage U.S. DOT to consider expressly stating that U.S. territories are eligible in any future RFI, program guidance, eligibility criteria, and designation materials, ensuring their ability to submit corridor proposals and be considered for AGCC designations, technical assistance, concierge services, and applicable federal coordination and financing support. U.S. DOT should consider broadening its stated intent to prioritize “longer multi-state corridors with regional significance” to afford equivalent consideration to high-value single-jurisdiction, island, inter-island, or non-contiguous corridors that demonstrate regional or national significance to ensure that they are not inadvertently overlooked.

NASEO encourages U.S. DOT to consider the National Alternative Fuel Corridors (AFC) program as a model for structuring AGCC. Like AGCC, AFC relies on a voluntary, state-nominated approach to designating corridors along the national highway system, and provides a durable, replicable framework for federal- and state-level interagency coordination. Adopting a similar nomination cadence, corridor-readiness criteria, and phased "corridor-ready" and "corridor-pending" designation structure would allow AGCC to build on existing relationships and data-sharing practices developed through AFC. Where AFC nomination packages already contain relevant information on energy infrastructure, grid capacity, or utility coordination, U.S. DOT may allow applicants to cross-reference or build directly on these submissions rather than starting from scratch.

NASEO appreciates U.S. DOT’s intent to provide geospatial resources supporting the identification of AGCC candidate corridors. A federally maintained geospatial platform that layers existing transmission and pipeline infrastructure, interconnection queue data, substation location and capacity, and planned generation projects onto highway and rail ROW maps would let states identify high-value colocation opportunities efficiently. Additional data such as available width, ownership, access constraints, existing utility occupancy, crossings, and other physical limitations would be useful in determining whether a corridor should be designated an AGCC. Housing this platform at U.S. DOT also allows for proper security measures to be taken regarding sensitive data. State Energy Offices, which routinely maintain or have access to much of this underlying energy infrastructure data, are well positioned to help validate and enrich these tools, ensuring they reflect real-world grid constraints and opportunities rather than transportation geometry alone.

NASEO commends U.S. DOT for launching an initiative that will help interested states to fast-track collocated energy infrastructure along transportation corridors and support reliable and affordable energy infrastructure for consumers and businesses. We appreciate the opportunity to provide these comments, and we look forward to engaging with U.S. DOT on this important work.

Best regards,

A handwritten signature in black ink, appearing to read 'DTerry', with a stylized flourish at the end.

David Terry, President, NASEO