

Sierra Club comments on Beneficial Electrification Recommendations

Thank you very much for developing, sharing, and enabling public comment on the recommendations from the Power Sector Transformation process. The Sierra Club believes the team has done an excellent job synthesizing the input to date and compiled positive recommendations in the Beneficial Electrification section. We look forward to commenting on proposals from National Grid that are consistent with these recommendations, so have no substantive comments on the draft at this time.

We do have one minor editorial note on the Beneficial Electrification draft. The draft refers to "the growth of intermittent resources (e.g., wind and solar)". The term "intermittent" is often misconstrued in this context, the appropriate term is actually "variable" energy resources (see e.g. FERC orders in this area, <https://www.ferc.gov/whats-new/comm-meet/2012/062112/E-3.pdf>). While wind and solar do vary, that variance is predictable, and at even significant penetrations approaching 100% can be addressed through forecasting, operational changes such as more minute scheduling, broad balancing areas, effective demand management practices, and proper valuation of flexibility and fast ramping as a service. Intermittency typically refers to less predictable and more difficult changes in generator output, such as a large nuclear plant tripping offline.

Thank you again for incorporating our feedback into the process, we look forward to engaging on the next steps envisioned here.