

**Before the Department of Energy
Washington, D.C. 20585**

Request for Information on)	
Energy Sector Industrial)	DOE-HQ-2021-0020
Base Supply Chain Review)	

**COMMENTS OF THE ELECTRIC POWER SUPPLY ASSOCIATION
ON THE REQUEST FOR INFORMATION**

Pursuant to the November 29, 2021, publication in the Federal Register¹ of the U.S. Department of Energy’s (DOE) Request for Information (RFI) on Energy Sector Industrial Base Supply Chain Review, the Electric Power Supply Association (EPSA)² submits the following comments. EPSA commends DOE’s exploration of a long-term strategy for strengthening the nation’s supply chains to enable the development needed to provide reliable, affordable, and cleaner power while also addressing near-term concerns which will be identified in this proceeding by companies and entities developing needed electricity resources and technologies.

EPSA member companies have built and operate tens of thousands of megawatts of generation, including an increasing number of renewable energy projects. It is important to point out that EPSA members have developed these resources through competitive markets, putting billions of investor dollars to work without any financial risk to captive ratepayers. Project development and costs are assumed and borne by competitive companies; therefore access, timeliness, and affordability of the materials

¹ 86 FR 67695, pp 67695-67703, Document number 2021-25898, published November 29, 2021.

² EPSA is the national trade association representing competitive power suppliers in the U.S. EPSA members provide reliable and competitively priced electricity from environmentally responsible facilities using a diverse mix of fuels and technologies. EPSA seeks to bring the benefits of competition to all power customers. These comments represent the position of EPSA as an organization, but not necessarily the views of any particular member with respect to any issue.

and components needed impact the very viability of the project itself. Competitive projects are not supported by customers captive to extensive delays or cost increases. As customer preferences continue to evolve and renewable technologies become more cost-competitive, competitive power suppliers are increasingly modernizing their fleets and scaling up their investment in lower emitting resources. As has been demonstrated over two decades of competitive wholesale power market operation, the most efficient and cost-effective way to reach the Administration's ambitious carbon reduction goals is through the deployment of competitive markets and competitive forces wherever possible. Certainly, supply chain issues can impact that development.

In addition to renewable resources, over the past two years alone EPSA members have also developed some of the largest battery storage projects in the world.³ In building projects of this scale, EPSA members have regular contact with a host of critical supply chains identified in the Department's RFI. To date, these companies have not had any major issues procuring equipment and component parts necessary to complete these projects but are certainly concerned that access to the materials needed remain unimpeded looking ahead. That noted, EPSA and our members will utilize this proceeding at the Department to offer new information should supply chain problems arise or appear imminent.

While procurement has not been a major challenge in recent months, EPSA members have experienced some minor delays related to orders being stranded and

³ See Press Release: *Vistra Completes Expansion of Battery Energy Storage System at its Flagship California Facility*, August 19, 2021. Available at : <https://investor.vistracorp.com/2021-08-19-Vistra-Completes-Expansion-of-Battery-Energy-Storage-System-at-its-Flagship-California-Facility>.; See also: *LS Power Energizes Largest Battery Storage Project in the World, The 250 MW Gateway Project in California*, August 19, 2020. Available at: <https://www.lspower.com/ls-power-energizes-largest-battery-storage-project-in-the-world-the-250-mw-gateway-project-in-california-2/>.

delayed on shipping containers at our nation's ports. While this is clearly an issue being experienced across a myriad of sectors, if such issues were to persist over the long term, it could pose challenges to competitive electric generation – especially as power plant developers continue to ramp up their renewable and battery storage development efforts. Accordingly, any efforts that the Department or Administration can undertake to continue to ease these pressures would greatly benefit the nation's energy transition efforts.

EPSA appreciates the Department's efforts on this critical front and looks forward to working with DOE and the Administration in the coming months and years to advance a reliable and affordable energy transition aided by the benefits of competitive forces.

Respectfully submitted,

ELECTRIC POWER SUPPLY ASSOCIATION

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Dated: January 14, 2022