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## FERC TECHNICAL CONFERENCE: Transmission Barriers to Entry

Comments of

**Edward M. Stern, CEO  
Hudson Transmission Partners**

*Tuesday, October 14, 2008  
Washington, DC*

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### POLICY OBJECTIVES

- I. Reduce Regulatory Uncertainty
  - Implement Mandatory Decision Timeframes
  - Select and Support “Winning” Projects... Pick the Best
  - Seek Regional – Not State by State – Solutions
- II. Level the Playing Field: Encourage New Entrants and Competition
  - Minimize or Protect At Risk Development Capital
  - Shorten Development Timeframe
  - Allow Regulated Returns – Based on Projects, Not Ownership
  - No Rights of First Refusal
- III. Encourage Partnerships
  - Independents with Utilities
  - Public/Private
- IV. Reward Performance Not Plans
  - Timely Completion
  - High Availability
  - Smart Grid Applications
- V. Support Long-Term Contracts for Transmission
  - LIPA
  - NYPA

Stern Comments – FERC Technical Conference – 10/14/08