



THE RAIL-GRID COLLABORATIVE

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U.S. Department of Transportation
Build America Bureau
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Request for Information on America's Great Corridors of Commerce Initiative¹

COMMENTS AND RESPONSES OF THE RAIL-GRID COLLABORATIVE September 28, 2026

INTRODUCTION

The Rail-Grid Collaborative (RGC)² applauds Dr. Morteza Farajian, Executive Director for the Build America Bureau (BAB), and his staff, for advancing the *America's Great Corridors of Commerce (AGCC)* initiative through this Request for Information (RFI) and the work being done by the Joint Office of USDOT and the Department of Energy (USDOE). We also express our thanks to the Secretary of Transportation (USDOT) for investing resources in this neglected area of infrastructure development. The RGC's comments are specifically focused on how this program can support and encourage the co-location of high-voltage transmission in transportation rights of way (ROWs).

The "corridors" that would be designated by BAB in response to voluntary private applications are in effect conditions precedent to multi-industry economic development efforts, as described in the draft term sheet agreement attached to the RFI.³ BAB plans to designate up to five corridors per year as the basis for a tiered, voluntary management process that would enable the co-location of high voltage transmission within corridors consisting of designated transportation ROWs. The AGCC P3 model coalesces around

¹[America's Great Corridors of Commerce; Request for Information](#) 2026-16776 (91 FR 53479)

² The RGC is a non-profit educational and advocacy group organized and headquartered in Washington DC, founded by James Hoecker, former Chairman of the Federal Energy Regulatory Commission. RGC is member-driven and supported by industry experts from academe, the railroad and power industries, and supporting suppliers and think tanks. RGC promotes expansion and modernization of both the North America electric grid and passenger and freight railroads through cross-sector business collaboration among experts in policy, engineering, finance, strategy, operations, and communications. RGC advocates for policies in related areas of state and federal law, and for forward-looking commercial transactions. See <https://rail-grid.org>.

³ "Public-Private Partnership (P3) Agreement for Colocation of Utilities Within Transportation Rights-of-Way," could include optic/broadband, district energy systems, water and telecommunications equipment, IT and renewable energy generation facilities.

contractual negotiations among ROW owners, retained project managers, and third-party “concessionaires” with rights and activities defined by agreement, including design, build, finance, operate and maintain infrastructure development within or adjacent to the ROW, notably development of underground utility tunnel(s) capable of co-locating multiple utility infrastructures.

In addition to providing a project development structure, the BAB RFI enumerates government’s supporting role in the corridor designation process: proposed funding or financing, “concierge” technical assistance, a taskforce of interested federal agencies (presumably some with permitting or other regulatory responsibilities) and the actual corridor designations. Despite its limited role in establishing corridors of co-located grid and rail facilities, BAB wants the AGCC to result in “macro-level cost savings and expedited project delivery leading to lower costs and increased utility deployment to meet the needs of both the public and industry.”

Finally, RGC notes that, although expanding or updating linear utility infrastructure is paramount among the RFI’s enunciated goals and benefits, the focal point of the AGCC and resulting negotiated processes is efficient utilization of transportation ROWs. The AGCC approach actively promotes, as an alternative or supplement to conventional transmission planning and siting procedures, an opportunity that has heretofore been hiding in plain sight – the use of existing ROWs. The benefits of AGCC will ultimately depend on the benefits of cross-sector collaboration, which RGC views as a powerful innovation.

In sum, the AGCC has a breadth of purpose that RGC believes could prove to be particularly supportive of several key industrial, military, national security, and climate objectives: (1) investment in the interregional or national aspects of the transmission system, (2) investment in the rail-based or rail-related manufacturing economy, (3) greater access to location-constrained power generation resources, (4) providing viable alternatives to greenfield industrial development that helps protect sensitive areas or communities, and (5) new opportunities for railroads to electrify elements of their operation.

RGC'S SELECTED RESPONSES

Previous conversations with BAB and interested industry segments indicate there is wide understanding of the critical challenges and barriers that must be addressed in any attempt to designate corridors for implementable transmission within rail corridors.⁴ The starting point for the AGCC program should be the mapping of existing rights of way and the (current and future) relationship of generation and load that must be factored into the designations. AI could be a valuable tool for the commercial and analytical processes BAB wants to incorporate formally into the AGCC. The AGCC RFI raises discreet matters of policy, operations, and technology that need to be discussed at this juncture. RGC therefore offers comments on the specific subject areas outlined in the Request for Information.

- Corridor Manager concept
- Development of Adjacent Property

⁴ RGC recommends Pacific Northwest National Lab and the DOT’s Volpe Center’s “Electric Transmission in Transportation Rights of Way: Gaps Analysis” (Rebecca O’Neil and Scot Gilman, *et al.*, 2025), “Cost and Benefit Risk Framework for Modern Railway Electrification” (University of Texas and the Federal Railroad Administration, 2025), and “Comments of Right of Way Advocates to USDOE, Phase 2 of National Interest Electric Transmission Corridors” (2024). All sources are available at Rail-Grid.org [Resources].

- Funding
- Underlying property concerns
- AGCC's role in interregional transmission planning and operations
- Utility tunnel concept
- Regulatory outs

1. Corridor Manager concept

Railroads are experienced in licensing occupancy of their rights of way. Many rail rights of way are already encumbered with numerous third-party crossings and occupants, along with a railroad's own signaling and other systems.

Given the railroads' experience in managing their corridors, and their need to ensure their rail structure and operations maintain integrity, a hybrid approach to the Corridor Manager concept may be appropriate to the extent the ROW owner shares or delegates site control to, say, a transmission developer or contractor. It is important to note that railroads already have real estate, industrial development, marketing, and engineering departments able to take on many of the responsibilities attributed to a Corridor Manager in the RFI. In addition, some railroads have long-standing relationships with contractors who assist in the management of third-party occupancy.

2. Development of adjacent property

The AGCC should attract new users for sites adjacent to railroad ROWs. RGC encourages employing AGCC to promote industrial development that can lead to rail and rail service growth, and which could be a major incentive for utilities, railroads, and manufacturing or shipping entities to participate in the AGCC program. Data centers are responsible for much of the growing power demand that makes transmission expansion necessary, but they are not typically users of rail services. That said, co-location of much-needed high voltage facilities or interconnections that feed those data centers could offer a leading-edge opportunity to both industries, including reliable electricity suppliers that might compete against the co-location of emitting gas turbines for service to data centers. Railroads are more likely to participate in the AGCC program if development along newly designated corridors includes opportunities and support for attracting new rail customers or re-developing existing facilities and property. A railroad's industrial development staff should be included as key company personnel.

There are many abandoned and decommissioned rail-served industrial facilities along railroad rights-of-way, and they offer possible locations for new facilities, including data centers. RGC contends that the use of these previously developed sites can help mitigate negative community impacts of industrial growth.

In addition, electric truck and yard tractor charging stations will become an increasingly important part of these developments in the future. Co-location with electric utility substations or other transmission infrastructure will thus be an advantage, as will co-location with rail intermodal facilities.

3. Funding

The installation of power transmission and substation infrastructure associated with a selected AGCC will require significant capital costs, which may be beyond the reach and ordinary budgeting of companies

that want to participate in such a development. Given the overarching public benefit of AGCCs, RGC encourages the BAB to provide direct forms of financial assistance, such as grants, that would be available for all stages of development.

4. Underlying property concerns

Railroad rights of way often date back 150 years, and are often held as surface rights, such as easements and land grants the use of which railroads generally understand in extraordinary detail. The complexity of using any ROW, including the ROWs alongside interstate highways, may nevertheless qualify the feasibility or cost of transportation co-location. Participants in any AGCC proceeding should carefully consider such factors in planning any transportation corridor that are proposed under the AGCC.

5. AGCC's role in interregional transmission planning and operations

The AGCC is not a platform for transmission planning or siting, jurisdiction over which rests with the states and other federal agencies. However, if the AGCC is able to expedite the development of new longitudinal utility infrastructure at scale within national corridors, it must also take into account the planning and regulatory regime that ordinarily governs the siting and permitting of transmission infrastructure. For DOT to lead a federal interagency task force focused on (1) expediting National Environmental Policy Act (NEPA⁵) review and facilitating the permitting and siting infrastructure within designated corridors, and (2) streamlining access to federal funding and financing, it will require a diverse skill set that can be systematically marshalled in conjunction with entities such as Regional Transmission Operators (RTOs), regional reliability councils, and regional and state economic development agencies. DOT leadership will be critical to avoiding significant delays, even for “shovel ready” projects. Transmission project delays can result in the abandonment of projects due to increased development costs and reduced returns on investment.

In the context of transportation ROWs, HVDC transmission is a powerful technology best suited to long distance bulk power delivery where the benefit of AGCC can be realized at scale. Transmission corridors will likely exit single service territories and cross through more than one regional market or regional planning authority. While that has historically increased the probability of project delays due to differences in state or regional grid planning, siting, and public policy, interregional transmission is projected to be in demand for reliability, extreme weather, and economic reasons. The newly designated corridors established under the AGCC can help mitigate these differences through utilization of already-disturbed transportation ROWs for a new generation of high-voltage projects and the other potential co-located infrastructures.

Although the AGCC program should offer some relief from the conventional siting regulation that has slowed transmission development, there remains a need to coordinate with responsible electric power regulators, planners, and operators to ensure the relevance and feasibility of the corridor designations and to bridge the gap between the two industries and their regulators. The BAB should further develop its own partnerships with the Department of Energy, the regional planners and reliability organizations, and states energy offices, beginning with honing the procedures of the AGCC itself.

⁵ U.S. Code 42 U.S.C. § 4321 et seq.

6. Utility tunnels

The RFI proposes that an underground utility tunnel is “one likely delivery method” for an AGCC-designated corridor. As described in the AGCC, this concept appears to replicate the magnitude of an aqueduct more than the narrow trenches typically employed to accommodate communications or electric infrastructure. Railroad rights of way may be narrower than those along highways that often offer multiple options for facilities, including undeveloped medians. Installing an underground tunnel in a railroad ROW could present an engineering challenge due in part to rail bridges and tunnels. Technological solutions are available for most such instances, even where EHV cable is installed. On this issue, however, the AGCC offers one of the most dramatic ways in which long distance HVDC facilities can be expeditiously placed.

7. Regulatory outs

The co-location of transmission along existing ROWs has two advantages over greenfield development. First, it can simplify occupancy negotiations to the extent there is a single, known land "owner" whose property can support new infrastructure. The railroad network may illustrate that situation. Second, co-location can help expedite permitting and siting facilities by minimizing or eliminating the environmental and social impacts of new construction on the affected property. The AGCC is predicated on reducing the compliance requirements under NEPA and related state and federal laws that protect individual environmental features. To do this, the AGCC relies on categorical exclusions from NEPA of project development, including exclusions under generic determinations of the Council on Environmental Quality (CEQ) or by legislation. Even if NEPA's more burdensome analysis requirements are not avoided in this way, the law's impacts on the pace of transmission development can be sped up by legally defensible findings of No Significant Impact after an assessment of a particular co-location situation. These approaches are a key justification for utilizing existing ROWs for grid expansions and upgrades as opposed to “greenfield” development. If such categorical exclusions are left to case-by-case determination, however, NEPA may still result in regulatory delays that slow down transmission additions and upgrades even under the AGCC.

CONCLUDING POINTS

RGC believes it is essential to streamline transmission siting and permitting under state and federal law. However, utilization of transportation corridors can be an immensely more efficient way to move grid additions ahead by avoiding or simplifying many of the individual regulatory barriers to grid upgrades that have proven too costly and slow to implement. The Department of Energy and the Joint Office of USDOT and USDOE have worked to accelerate transmission corridor development as a complement to the broad transmission siting and permitting reforms in Congress and the industry, in response to concerns about the grid's state of preparedness to meet the exploding demand for electricity that technological and demographic changes will likely soon produce. RGC therefore congratulates BAB for developing a new way of tackling the barriers to grid expansion and modernization that coincides with RGC's own program to foster collaboration between these two industries.

RGC observes that the AGCC process complements the current infrastructure planning and permitting regimes that govern infrastructure deployment. It may nudge companies toward a private enterprise

solution to the problem of regulatory delay. RGC believes it may be particularly valuable as a way to meet the need for multi-value, multi-participant transmission projects bridging more than one region or market. These are often governed by different planning protocols, driven by the predominance of one or more resources, or financed through disparate cost-allocation methods or financing instruments. In this context, the regional and interregional real estate assets of railroads may be most valuable. Moreover, unlike co-location of transmission along highway ROWs, the process need not be driven by state or federal regulatory (i.e., DOT) rules or policies. In the final analysis, the success of co-location of transmission within railroad ROWs will depend on private initiative. If BAB can persuade railroads and transmission owners and developers to work productively together, it will have achieved a great thing.

Finally, even the structure of the AGCC could limit the individual economic choices of railroads or transmission or communications companies and influence the voluntary “negotiations” among these industries. BAB should therefore keep in mind that it can still enable co-location progress outside the AGCC. In addition, the AGCC process should take advantage of AI as a way to develop a data platform and to simplify or streamline the structured interaction between these project managers and the concessionaires that BAB wants to encourage to participate. AI can be a remarkable tool---highly beneficial but potentially desultory. RGC therefore believes that BAB should further investigate applying AI to this program and spelling out its potential benefits as part of the AGCC.

Finally, RGC notes that, although expanding or updating linear utility infrastructure is paramount among the RFI’s enunciated goals and benefits, the focal point of the AGCC and resulting negotiated processes is efficient utilization of transportation ROWs. It is there that ROW owners and corridor managers will confront and negotiate the changing roles and responsibilities that will dictate the AGCC’s outcomes. That said, the AGCC approach actively promotes, as an alternative or fresh complement to conventional transmission planning and siting, the utilization of ROWs for project development. This is an extraordinary opportunity that, in RGC’s view, has been hiding in plain sight. AGCC offers the added benefit of fostering cross-sector collaboration, which RGC views as a powerful innovation.

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RGC contends that the railroad and electric power industries need to be encouraged to work together. The potential for growth in each sector will be inhibited without it. RGC therefore encourages the BAB to leverage the immense expertise of the rail and power industries to target new infrastructure expansions and upgrades. We look forward to helping them and the BAB seize this important opportunity.

Respectfully submitted,

ON BEHALF OF
THE RAIL-GRID COLLABORATION



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