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Filing Details:

Department of Energy – Federal Energy
Regulatory Commission (FERC)
Title 18 – Part 35

Rescission Type:

Final Rule
FERC Order 1920-A

Filing Entity:

Christian Employers Alliance –
Center for Biblical Business

Filing Date:

May 12, 2025

Short Summary of the Justifications for the Rescission

The **Christian Employers Alliance (CEA)**, a national organization committed to protecting the freedom of Christian business owners to operate according to their faith and conscience, strongly urges the immediate rescission of **Order 1920** due to its harmful economic, operational, and ideological implications. The order mandates massive new investments in renewable transmission infrastructure that impose extreme financial burdens on ratepayers – especially small and mid-sized business owners who are already struggling with rising energy costs.

These costs are not incidental – they are the direct result of a federal transmission directive that prioritizes speculative green energy targets over economic realism, public safety, and grid reliability. The costs will be passed down to ratepayers through higher electricity bills, directly affecting the bottom line of energy-intensive businesses such as manufacturers, processors, and service providers across the country.

Worse still, by focusing on long-distance transmission projects meant to serve intermittent renewable generation, the order diverts critical resources from maintaining aging infrastructure. Businesses cannot function without reliable power. Every dollar siphoned toward politically motivated projects – many of which fulfill Environmental, Social, and Governance (ESG) agendas – is a dollar that could have gone to preventing wildfires, repairing lines, or reinforcing substations.



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The consequences of this misplaced focus are already evident. Utility company **Xcel Energy**, for instance, has been implicated in catastrophic wildfires in **Colorado (2021)** and **Texas (2024)** – events that caused extensive property damage and business disruptions. During the same period, Xcel's corporate reports show a heavy adherence to its ESG and DEI initiatives.* For example, Xcel's releases detail how federal funds for wildfire mitigation and grid resiliency were directed toward solar, battery, and microgrid projects in “communities of color”, such as Minneapolis – communities likely chosen for socio-political reasons under their ESG framework.**

This ideology-driven misallocation of resources is institutionalized under **Order 1920**, which embeds **decarbonization, equity, and climate policy compliance** directly into mandatory regional transmission planning. This risks transforming the grid from a public utility into a vehicle for ideological social engineering. CEA believes this is a dangerous precedent – one that imposes economic harm while promoting **ideological frameworks (ESG/DEI) that often conflict with the faith-based values and conscience rights** of Christian employers.

The CEA's Center for Biblical Business is a leading voice on this issue and working to educate lawmakers on the consequences of ESG-driven utility policy through our economic freedom initiative – one of CEA's five core pillars. The path forward must not be dictated by politically fashionable metrics, but by the needs of those who rely on affordable, safe, and dependable electricity to sustain their businesses and communities.

Background on the Regulation Being Rescinded

Order No. 1920, finalized by the **Federal Energy Regulatory Commission (FERC)** in May 2024, represents one of the most sweeping changes to electric transmission policy in decades. It mandates that transmission providers adopt 20-year planning horizons with specific required inputs – namely, state and federal **climate laws, electrification targets, corporate decarbonization goals**, and other forward-looking policy mandates.

These are not optional considerations. They are required drivers of infrastructure investment under the order, which means utilities must now structure their long-term planning to align with the ideological priorities of policymakers and multinational corporations. The transmission lines proposed under this framework are expensive, slow to build, frequently redundant, and often fail to serve the real power needs of businesses and communities.

Supporters of the rule, such as the **League of Conservation Voters**, tout it as a green energy mandate. Opponents, including **Rep. Chip Roy (R-TX)**, rightly view it as a federal power grab designed to subsidize large renewable developers at the expense of ordinary Americans and small



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business owners. In July 2024, Rep. Roy introduced an amendment to block the rule – though narrowly defeated, the vote revealed serious bipartisan concerns over its cost and overreach.

Order 1920-A, issued in November 2024, only compounded these issues by leaving the core mandates untouched.

Notably absent from either version of the rule is a serious evaluation of wildfire risk, deferred maintenance, or system reliability. The only mention of wildfires in the rulemaking docket came from NARUC, which warned that “some wildfires have been linked to deferred transmission maintenance of aging infrastructure.” But this issue was not explored in depth, no risk assessment was conducted, and no fire-related mitigation requirements were integrated into the rule. This omission, in light of recent utility-sparked disasters, reflects a dangerously narrow focus in the Commission's planning priorities.

Reason for the Rescission

Christian employers are already under pressure from rising energy costs, ESG-driven corporate mandates, and regulatory hostility toward faith-based values. Order 1920 compounds all of these threats. It burdens them with unaffordable electricity bills, undermines the reliability of the grid, and institutionalizes ideological agendas that marginalize or contradict their deeply held beliefs.

The Christian Employers Alliance is especially concerned with the **ideological underpinnings of Order 1920**, which mirror the growing trend in the corporate and regulatory sectors to embed **ESG (Environmental, Social, and Governance) and DEI (Diversity, Equity, and Inclusion)** priorities into otherwise technical infrastructure decisions. In practice, this means that Christian-owned businesses are being compelled – through rising rates and distorted market incentives – to financially support initiatives that often contradict their moral framework and religious convictions.

For example, Xcel Energy's own ESG documents proudly cites how their wildfire mitigation plan aligns with the **United Nations Sustainable Development Goals**, including climate action and social change initiatives. At the same time, critical infrastructure that had been neglected ultimately contributed to the **largest wildfire in Texas history** – one that destroyed homes, businesses, and livelihoods. These misplaced priorities are exactly the type of trade-offs that Order 1920 would codify across the national grid.

At the heart of this rule is a shift from **technological neutrality and reliability** to **political and ideological engineering**. It is not the role of the federal government to force businesses to conform



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to progressive environmental ideologies, nor should utility planning be driven by climate scorecards or social equity mandates.

CEA calls for the **immediate repeal** of Order 1920 and a return to a **balanced, transparent, and practical framework** for electricity transmission – one that:

- Focuses on maintaining and modernizing existing infrastructure,
- Avoids discriminatory or ideological mandates,
- Preserves market competition through the continued elimination of right of first refusal (ROFR),
- Respects conscience rights and religious liberty,
- And ensures that utilities serve the needs of their customers, not corporate climate agendas.

Until such reforms are enacted, Christian employers will remain vulnerable – economically, operationally, and ideologically – to a grid system hijacked by progressive politics. Rescinding Order 1920 is the first, necessary step to restore energy policy to its rightful purpose: serving the people who rely on it every day.

*Sources:

*<https://corporate.my.xcelenergy.com/s/about/report/document-library>

**<https://corporate.my.xcelenergy.com/s/about/newsroom/press-release/xcel-energy-receives-100-million-department-of-energy-grant-to-boost-wildfire-mi-MCFFNTYYL2FNAATFMYQTRRAHB7JQ>

Text of the Relevant C.F.R. Provisions as it will Exist after the Rescission:

Regulatory Policy will Revert to FERC Order No. 1000 - Transmission Planning and Cost Allocation

Respectfully Submitted,

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