

Do electrical interties stimulate Canadian hydroelectric development? Using causal inference to scope environmental impact assessment in evolving sociotechnical systems

Amir M. Gazar^{1,2,*}, Mark E. Borsuk³, Ryan S.D. Calder^{1,2,3,4,5}

¹ Department of Population Health Sciences, Virginia Tech, Blacksburg, VA, 24061, USA

² Global Change Center, Virginia Tech, Blacksburg, VA, 24061, USA

³ Department of Civil and Environmental Engineering, Duke University, Durham, NC, 27708, USA

⁴ Faculty of Health Sciences, Virginia Tech, Roanoke, VA, 24016, USA

⁵ Department of Civil and Environmental Engineering, Virginia Tech, Blacksburg, VA, 24061, USA

* Contact: amirgazar@vt.edu.

Abstract

Debates over the scope of environmental impact and life cycle assessment frequently revolve around disagreements on the causal structure of complex sociotechnical systems. Environmental advocates in the United States have claimed that new electrical interties with Canada increase development of Canadian hydroelectric resources, leading to environmental and health impacts associated with new reservoirs. Recently, two large (9.5 TWh year⁻¹) transborder transmission projects were cancelled as a result of community opposition, delaying decarbonization. We demonstrate via Bayesian network modeling that development of Canadian hydroelectric resources is stimulated by price signals and domestic demand rather than increased export capacity. This suggests a narrower scope for environmental impacts considered in the setting of transborder interties and may increase support for transmission projects among stakeholders. More broadly, Bayesian analysis can be used to elucidate causal drivers in evolving sociotechnical systems to develop consensus for the scope of environmental impacts to consider in cost-benefit analysis.

1. Introduction

Since the passage of the National Environmental Policy Act (NEPA) in the United States in 1970, the vast majority of countries have enacted legislation requiring environmental impact assessment (EIA) for different categories of civil infrastructure projects (Morgan, 2012). While there is great variability in legal triggers, required scope, and practical effects of EIA policies internationally, they generally anticipate (1) a scientific process for prospective characterization of possible environmental impacts of construction and other projects; and (2) a mechanism to use EIA results to inform permitting, design, mitigation plans, or other decisions before environmental impacts occur (Wathern, 1990).

Critiques of EIA have identified failures to account for all relevant causal pathways, outcomes, or phenomena, and for oversimplifying heterogeneity or uncertainty in impacts (Health Canada, 2011; Kitchen & Ronayne, 2013; Natural Resources Canada, 2009; Peeters et al., 2022; Wright et al., 2013). In particular, impacts mediated through social systems, i.e., those which are conditional on an unknown future individual or social response, are virtually never addressed in EIA due to a lack of integrated modeling capacity or efforts by project proponents to limit EIA scope. This includes results of economic phenomena such as the “rebound effect”, where projects improving efficiency accelerate rather than arrest depletion of natural resources or environmental degradation (Owens et al., 2022), and market actions of electricity suppliers following projects that increase transmission capacity, which is the focus of the present analysis (*Border Power Plant Working Group v. Department of Energy*, 2003).

Decarbonization has been delayed by controversies and deficiencies in EIA. In the United States, NEPA and state-level analogues are the most common bases for litigation against renewable energy projects, accounting for 643 out of 2124 lawsuits across 31 categories of legal challenge inventoried by the U.S. Climate Change Litigation database as of November 2023 (Sabin Center for Climate Change Law, 2023). The land-use needs of renewable energies suggest that EIA will play an increasing role in debates over decarbonization decisions. For example, Lovering et al. (2022) calculate future global land use requirements of roughly 207 Mha by 2050 to achieve the International Energy Agency’s 2°C warming scenario compared to 97 Mha in 2017, not counting land required for transmission infrastructure.

Northern U.S. states are importing increasing amounts of hydropower from Canada to achieve decarbonization objectives, with net imports increasing by 1.1 TWh year⁻¹ between 2007–2021 (Natural Resources Canada, 2023). While increased transmission between the northeastern U.S. and Quebec is likely to lower direct and indirect (e.g., health, environmental) costs associated with the energy transition (Calder et al., 2022; Dimanchev et al., 2021), such projects have faced legal and political challenges. Two proposed transmission corridors through New Hampshire and Maine (~ 9.5 TWh year⁻¹ each) were suspended in 2018 and 2021, respectively (*Appeal of Northern Pass Transmission, LLC & a.*, 2019; *NECEC Transmission LLC et al. V. Bureau of Parks and Lands et al.*, 2022; Gronendyke, 2018; Maine Department of Environmental Protection, 2021; U.S. Department of Energy, 2017).

Opposition has been animated by (among other factors) the claim that increased transborder transmission will lead to expanded generation in Canada, exacerbating diverse impacts such as

greenhouse gas emissions from reservoirs and accumulation of methylmercury in the traditional foods of Indigenous communities (Calder et al., 2016; Rosenberg et al., 1997). This casts generation-side environmental and health impacts of reservoirs as second-order consequences of transmission projects and demonstrates how EIA controversies are often implicitly disagreements over the best causal models to overlay on complex socioenvironmental systems (Birchard, 2017; Webster, 2022). While the Department of Energy (DOE) has so far declined to consider generation-side impacts as causally downstream from transmission projects, advocates have made legal filings arguing that DOE is compelled to do so (Birchard, 2017).

In the United States, NEPA requires evaluation of “reasonably foreseeable” environmental consequences with a “reasonably close” causal link to a federal action (e.g., permit issuance) even if these consequences fall outside the U.S., and even if they are second-order or indirect effects (*Border Power Plant Working Group v. Department of Energy*, 2003; Council on Environmental Quality, 2021). Recent updates to the regulations governing NEPA implementation reaffirm that relevant impacts may occur at a different time or place than the covered action while clarifying that simple “but-for” causation is generally an insufficient standard (Council on Environmental Quality, 2020). Executive agencies generally have broad discretion and latitude to apply their own judgments in scoping and interpreting EIA, even while their actions and findings under NEPA can be (and frequently are) reviewed by the courts (Colburn, 2016). Beyond NEPA, asserted and disputed causal relationships animate controversy over the required scope of EIA, create disagreement over alternative renewable energy pathways, and, overall, delay progress toward decarbonization.

Meanwhile, there has been controversy over the accounting and valuation of greenhouse gas impacts associated with increased use of Canadian hydroelectric resources in the U.S. energy mix. “Attributional” assessment (Ekvall, 2019), whereby a fraction of the life cycle emissions of existing reservoirs is assigned to energy imported over new electrical interties, is common, even among prospective cost-benefit analyses (New York State Energy Research and Development Authority, 2021). We have previously argued that this has the effect of underestimating net benefits from incremental expansion in transmission when these projects have no causal connection to new reservoir development (Calder et al., 2022). Indeed, a “consequentialist” perspective, whereby alternative interventions are compared in terms of the impacts causally connected to each candidate intervention, are better suited to decision support, but are underutilized in energy systems analysis (Curran et al., 2005). However, these approaches are complicated by an often incomplete understanding of the causal connections in evolving energy systems.

There is increasing interest in the application of statistical causal inference tools to scope EIA in the context of biophysical perturbations (Arif & MacNeil, 2022; Paul, 2011). We have not however identified any research that examines how these methods may elucidate impacts mediated through complex social or economic systems, such as the renewable energy transition. As described, these can be the most challenging setting for EIA and have been the site of much recent debate and controversy. Tools to evaluate causal relationships among components of evolving sociotechnical systems such as decarbonization are needed to build consensus around the appropriate scope of EIA, allow for consequentialist analysis in decision support, and to

understand the likely range of impacts associated with alternative policy pathways more broadly, and are thus the focus of this work.

Here, we conceptualize the Quebec–New England–New York electricity market as generation, demand, transmission, and price phenomena connected via a causal network with uncertain structure. We develop a rich dataset covering the period 1979 to 2021, which we use to evaluate the plausibility of alternative causal structures represented by Bayesian networks (BNs). BNs are directed acyclic graphs (DAGs) used to evaluate the evidential support for the presence and directionality of causation among system variables (Hernan & Robins, 2023; Nogueira et al., 2022; Pearl, 1995, 2000; Spirtes et al., 2001; Su et al., 2013). Specifically, we interrogate the claim that transborder transmission infrastructure stimulates hydroelectric development in Canada. As described above, this claim has been the basis for legal filings arguing that DOE is required to consider generation-side environmental impacts in permitting transmission infrastructure and has contributed to opposition to these projects. We also characterize evidence for other asserted or hypothesized causal relations in this system and identify challenges inherent in the use of causal inference methodologies for complex sociotechnical systems more broadly.

2. Methods

2.1. Study area

Quebec, Canada has 43 018 MW of installed hydroelectric capacity (including supply from Churchill Falls in Labrador), accounting for 91% of total generation (Hydro-Québec, 2022a). Quebec shares a border with the U.S. states of Maine, New Hampshire, New York, and Vermont and is a major exporter of electricity through interties with the latter three states. Development of large (>245 MW) hydroelectric facilities began with La Tuque (entry into service in 1955) and has continued to present day with Romaine-4 (2022). Locations of existing interties and large generation facilities are plotted in Figure 1.

The six states of New England share a common transmission

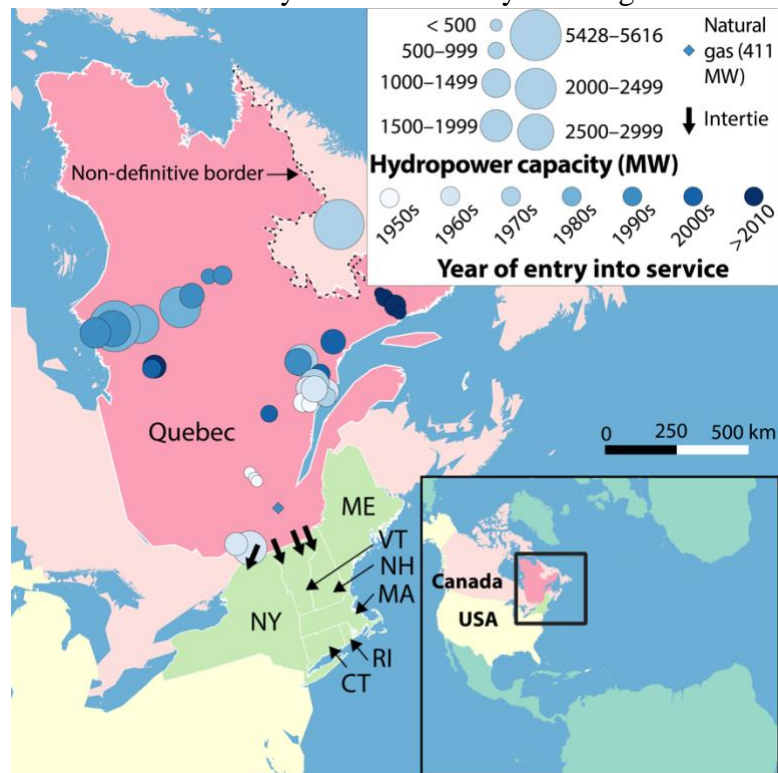


Figure 1: Large (>245 MW) generation and transborder transmission infrastructure in Quebec, Canada including Churchill Falls in Labrador. New York (NY), New England states Connecticut (CT), Massachusetts (MA), Maine (ME), New Hampshire (NH), Rhode Island (RI), and Vermont (VT), and Quebec, Canada, are highlighted. Years of entry into service and installed capacity from Hydro-Québec (2023). Locations of infrastructure from Hydro-Québec (2020).

system operator, ISO New England, though each state has different renewable energy targets and has historically managed renewable energy procurements individually. The electrical grid in New York is managed by ISO New York. We refer to New England and New York collectively as the northeastern United States (NE USA). Historically, surplus generation from Quebec has been sold on the short-term spot market to neighboring states and provinces (i.e., 90% of exports between 2014-19). However, recently, longer-term export contracts tied to large purpose-built infrastructure have been pursued (Calder et al., 2022). This includes a 10.4 TWh year⁻¹ corridor through New York recently completed and two 9.5 TWh year⁻¹ corridors to Massachusetts via New Hampshire (cancelled) and Maine (suspended).

2.2. Model conceptualization

We developed a conceptual model for generation, demand, transmission, and price variables, representing assumed and disputed causal connections in the Quebec and NE USA electricity markets (Figure 2). Installed hydropower generation capacity is a function of current and projected demand and factors of safety to reflect uncertainties in future generation (governed by hydrologic conditions) and demand (Stedinger et al., 1984; U.S. Department of Energy, 2016). High-consequence dams require higher factors of safety for such uncertainties, increasing the probability of overdesign (Fell et al., 2005; Herza et al., 2018). Exports are meanwhile determined by generation capacity, price signals resulting from the balance of supply and demand domestically and in export markets, and the capacity of available transmission infrastructure. Investments are necessary for increases in both installed generation and transmission. To our knowledge, these basic dynamics are not in debate and we have represented them as “asserted relationships” in Figure 2.

Development of transborder transmission capacity stimulated by U.S. electricity demand may accelerate the development of Canadian hydroelectric resources by enhancing opportunities for export. Historically, higher prices for electricity in the U.S. than in Canada have played a major role in the pursuit of export opportunities by Canadian utilities (Warner & Coppinger, 1999).

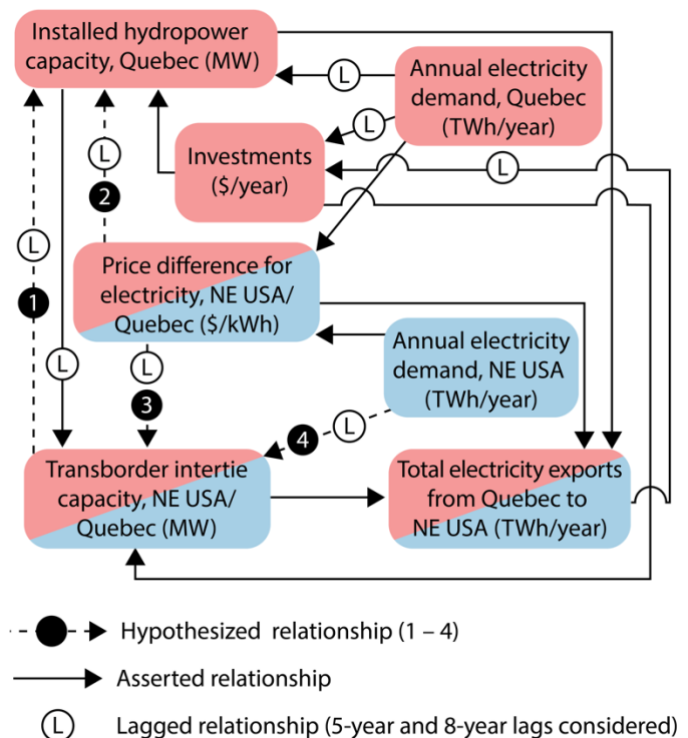


Figure 2: Conceptual diagram showing asserted and hypothesized relationships between generation, transmission, and demand variables in New York/New England (NE USA) and Quebec, Canada. Investments are a subset of revenues (omitted). Asserted and hypothesized relationships are described in the text. System variables are shaded red for Quebec, blue for the NE USA, and red/blue for transborder.

These export opportunities continue to be acknowledged in decision-making around new projects, for example, coupling the Maritime Link transmission project with the 824-MW Muskrat Falls hydroelectric project in Newfoundland & Labrador, developed in the 2010s (Government of Newfoundland and Labrador, 2012). Meanwhile, public statements by Hydro-Québec, the government-owned utility that manages electrical generation and distribution in Quebec, Canada, suggest that the export market is necessary for profitability (Snyder, 2018).

The claim that increased transborder infrastructure leads to increased generating capacity in Canada is the central focus of this analysis and is represented as Hypothesis # 1 in Figure 2. An affirmative finding would support the argument that generation-side impacts are “reasonably foreseeable” consequences of transmission infrastructure and hence reviewable under environmental impact assessments mandated by NEPA for federal permitting as previously argued to DOE (Birchard, 2017). Conversely, a negative (or null) finding may increase support among stakeholders who currently oppose transmission infrastructure on the basis of a supposed stimulating effect on generation (Webster, 2022).

Beyond this central question, we evaluate other, non-mutually-exclusive relationships. Relationship # 2 holds that installed hydroelectric capacity is instead stimulated by the price difference between Quebec and the northeastern U.S. Other relationships evaluated represent potential drivers of transborder intertie capacity: Relationship # 3 hypothesizes that intertie capacity is stimulated by the same price difference, and Relationship # 4 hypothesizes that intertie capacity is stimulated by U.S. demand. These alternative hypotheses have fewer immediate implications for environmental impact assessment but may provide an alternative causal framework by which to understand the temporal evolution of this system.

2.3. Variable definition and data aggregation

Table 1 summarizes the raw variables aggregated for this analysis with reference to the original data sources. Some variables are then transformed to reflect likely lags (represented in Figure 2 and described in Section 2.3). We selected the period 1979–2021, which maximizes data availability for relevant variables while covering all periods of major expansion of transborder transmission capacity.

Hydro-Québec’s annual reports were consulted to acquire information regarding the company’s generation capacity, its sales to the domestic market, its exports to outside markets, its annual revenues, and its investments in transmission and generation infrastructure. Capacity of transmission lines was often reported in kV, which is not directly comparable to generation or transmission in MW. We converted transmission capacity to MW using the transmission line power-transfer capability curve commonly known as the St. Clair curve presented in supplemental information (SI) Figure S1 (Gutman et al., 1979), calibrated using eight available data points and applied to seven remaining points where capacity in MW was unknown (Equation 1). R^2 for the calibration curve was 0.998. Calibration and prediction data are included in SI Table S1. The calibrated St. Clair curve is written as:

$$P = \alpha_1 V^2 + \alpha_2 V + \beta \quad \text{Eq. 1}$$

In Equation 1, P is the maximum loadability (capacity) in MW; V is the maximum voltage in kV; α_1 is a constant calculated via calibration as 0.004431; α_2 is a constant calculated via calibration as -0.5154; and β is a constant calculated via calibration as 20.82.

To represent the disparities in electricity prices between these regions, we calculated the price difference between Quebec vs. NE USA based on average electricity price per kWh from both regions. We tabulated other data related to climate and electricity sales to explore possible other correlations and identify potentially overlooked variables. These variables are described in SI Table S2 but are not retained in the final causal model described below.

Table 1: Summary of data aggregated for causal analysis, 1979-2021. Bolded variables correspond to conceptual Figure 2 and include values derived from underlying data sources. Unbolded variables allow calculation of certain derived variables.

Variable name	Units	Description	References
EXPORTS	TWh year ⁻¹	Hydro-Québec's total exports	Hydro-Québec (1979–2021)
DEMAND_QC	TWh year ⁻¹	Hydro-Québec's electricity sales to the Québec's market; equates to generation net of transmission losses	Idem
DEMAND_US	TWh year ⁻¹	Annual electricity sales to ultimate customers for NE USA (New England and New York).	U.S. Energy Information Administration (2022)
INVESTMENT	\$CAD year ⁻¹	Total investments in generation and transmission infrastructure made by Hydro-Québec	Hydro-Québec (1979–2021)
INSTALLED	MW	Installed hydroelectric generation capacity in Quebec, Canada	Idem
INTERTIE	MW	Transborder intertie transmission capacity (see text for method to convert from kV)	U.S. DOE (1979–2021)
PRICE	\$CAD kWh ⁻¹	Price difference between U.S. and Quebec [= PRICE_US × EX_RATE – PRICE_QC]	n/a
PRICE_QC	\$CAD kWh ⁻¹	Annual average retail electricity prices for electricity in Quebec	Hydro-Québec (2022b)
PRICE_US	\$USD kWh ⁻¹	Annual estimate of average electricity price in NE USA	U.S. Energy Information Administration (2022)
EX_RATE	\$CAD \$USD ⁻¹	Exchange rate between Canadian and U.S. dollars	Federal Reserve Board (2023)

2.4. Variable transformations

Intertie capacity and installed generation capacity reflect large civil infrastructure projects with lead times of an average of 8.6 years between announcement and completion (Ansar et al.,

2014). We therefore expect that responses in the form of infrastructure expansion may be lagged with respect to their predictor variables (as represented in Figure 2). However, infrastructure decisions are also made on the basis of forecasts and may be pursued in parallel with complementary components (intertie may expand in anticipation of new generation or vice versa). For infrastructure outcomes, we consider lags in potential predictor variables of both 5 and 8 years.

Furthermore, we expect many variables represented in Figure 2 to respond not necessarily to the absolute value of upstream nodes (i.e., their parents) but rather to changes in those variables over some preceding time period. For example, sudden increases in intertie capacity may stimulate expansion in generation (Hypothesis 1). Therefore, both generation and transmission were represented as the 5- or 8-year running average of changes (which serve as predictors lagged 5 or 8 years as described above). A lag is implemented for infrastructure variables serving as predictors but not when the same variable serves as an outcome. Thus, some variables may have more than one representation.

Table 2: Asserted and hypothesized causal relations indicating lagged (5 or 8 years), Box-Cox transformed and discretized variables. Relations are summarized in Figure 2. Expanded figure showing all representations of variables included in SI Figure S2A.

Response variable	Asserted causal (parent) variable(s)	Hypothesized causal (parent) variable(s)
INSTALLED ^{a,b}	DEMAND _{QC} ^c , INVESTMENT ^{d,e}	INTERTIE ^{f,h,1} , PRICE ^{g,b,2}
INTERTIE ^{a,h}	INVESTMENT ^{d,e} , INSTALLED ^{i,e}	PRICE ^{g,b,3} , DEMAND _{US} ^{c,4}
EXPORTS ^j	PRICE ^{j,b} , INSTALLED ^{a,b} , INTERTIE ^{a,h}	n/a
INVESTMENT ^{d,e}	EXPORTS ^{c,k} , DEMAND _{QC} ^c	n/a
PRICE ^{j,b}	DEMAND _{US} ^{j,e} , DEMAND _{QC} ^{j,e}	n/a

^a Total expansion in 5- or 8-year period up to year t

^b Box-Cox transformed variable

^c 5- or 8-year lag of the 5 or 8-year moving average for the incremental expansion, i.e., value in year t minus value in year $t-1$

^d Average total investment in 5- or 8-year period up to year t

^e Discretized variable ("low", "medium", "high")

^f 5- or 8-year lag of the total intertie capacity expansion in 5- or 8-year period up to year t

^g 5- or 8-year lag of price difference in 5- or 8-year period up to year t

^h Discretized variable ("non-significant", "significant")

ⁱ 5- or 8-year lag of the total installed capacity expansion in 5- or 8-year period up to year t

^j Average expansion in 5- or 8-year period up to year t

^k Discretized variable ("negative", "positive")

^{1,2,3,4} Hypotheses 1, 2, 3 and 4

Finally, variables were transformed to respect the underlying assumptions for the structure and parameters of the BN approach used. BN models can be learned from data on continuous

variables that are normally distributed, or on categorical variables. Therefore, if they are not already normally distributed, data may either be transformed to respect the assumption of normality or discretized. We thus evaluated each variable for normality using the Shapiro-Wilk test with a significance level of 0.05. Non-Gaussian variables (i.e., those that failed the Shapiro-Wilk test) were transformed using the Box-Cox method with the `boxcox()` function in the *MASS* package in R (Ripley & Venables, 2003) to achieve normality where possible in order to retain maximum information.

After transforming the non-Gaussian variables, we reapplied the Shapiro-Wilk test to evaluate the effectiveness of the transformation. Variables that failed the Shapiro-Wilk test post-transformation were then discretized. Discretization of variables was done manually using the `ordered cut()` function in R; this means that continuous variables were converted to ordinal discrete variables. We used histogram plots to determine the cutting points for each variable to ensure a roughly equal distribution of observations across variable levels. Depending on the variable's definition (Table 1) and its histogram, we discretized the variables according to three different schema: 1. "low", "medium", or "high", 2. "non-significant" or "significant" and 3. "negative" or "positive". Implementation of a manual discretization protocol helps ensure production of meaningful and interpretable BN models (Beuzen et al., 2018). All transformations are reported in Table 2. Code for all variable manipulations and transformations is included in the reproduction information (RI).

2.5. Bayesian network modeling and evaluation of causal relations

We used BN modeling to test alternative model structures against data in order to evaluate the plausibility of asserted and hypothesized causal relations (Section 2.1). BNs are probabilistic graphical models that represent sets of variables and their conditional dependencies in the form of DAGs (Scutari & Denis, 2021). DAG representation of these networks aids in illuminating possible causal relationships between variables, providing a clear illustration of how one variable or factor can affect others. BN models contain two major components: the network *structure*, which maps nodes and directed edges to create a DAG; and conditional probability distributions for each node, which are represented using *parameters*, describing the relative likelihood of values of response variables conditioned on the values of its direct causes.

Two types of data-training algorithms are available to evaluate network structures against a dataset: *score-based* and *constraint-based* (Su et al., 2013). *Score-based* methods calculate a score for alternative structures, and the score reflects the ability of that structure to explain the observed data. Score-based methods are commonly favored for datasets that are small and contain noise (Cheng et al., 2002). In score-based methods, the objective is to identify the configurations that yield high scores. Conversely, *constraint-based* methods seek to identify conditional independence (i.e., Markov condition) among variables. These methods use data to perform hypothesis testing regarding conditional independence to eliminate edges from a fully connected undirected graph. Subsequently, directions are assigned to edges in accordance with the *d-separation* criterion (Pearl, 2000). It is also common to use hybrid algorithms that integrate the two types of methods to capture the benefits of each as a function of the properties of the dataset and the strength of hypotheses (Tsamardinos et al., 2006).

Our dataset does not have a sufficient number of observations to effectively perform the hypothesis tests required of constraint-based methods, particularly as many variables had to be discretized, resulting in a loss of information, and some variables were lagged, resulting in a loss of some years (described in Section 2.3 and summarized in Table 2). Consequently, we rely on a score-based method to evaluate the network structure against data. Specifically, we adopted the log-likelihood scoring criterion and employed a hill-climb (HC) algorithm using the `hc()` function in the *bnlearn* package for R to identify the highest scoring network (Scutari et al., 2023). Generally, the log-likelihood criterion is the least restrictive (will admit the most relations), enabling us to most confidently rule out hypothesized (or asserted) relations if they do not appear in the best-fitting model structures.

To further assess the degree of confidence in returned relations, we also applied alternative scoring criteria (Akaike information criterion, or AIC, and Bayesian information criterion, or BIC) that penalize for the number of edges in the network. AIC and BIC results are discussed in greater detail in the SI. In all cases, the algorithm was initialized using the hypothesized network presented in Table 2 and was constrained by a blacklist consisting of all illogical relations between variables (e.g., contemporary variables cannot influence lagged variables).

To interpret the network relations (i.e., assign a direction of effect) and measure the goodness of model fit for each variable in our DAG, we used the `predict()` function with the *bayes-lw* method (Needham et al., 2007). The *bayes-lw* method performs both causal prediction and noncausal Bayesian inference using Monte Carlo methods. Further likelihood weighting ensures that predictions account for all possible values of variables accounting for their relative likelihood. To assess goodness of fit for continuous numerical variables, we calculated the coefficient of determination (r^2), while for discretized variables we calculated the proportion of correct predictions as a measure of model accuracy.

Finally, to further interrogate specific relations of interest, we used the d-separation criterion. Informally, the d-separation criterion states that, “Each variable is independent of its non-descendants in the network given its parents” (Ding & Rebai, 2010). More formally, the d-separation criterion specifies the set of conditional dependences and independences that are implied by a particular graph and subject to statistical hypothesis testing. Specifically, we used our data to test the independence of pairs of nodes by conditioning each pair on the pair's parents. If the p-value for an independence test is greater than the high threshold of 0.95, then the two variables are interpreted as "Conditionally Independent". If the p-value is smaller than the low threshold of 0.05, then this is labeled "Potential Missing Link". If the p-value is between the low and high thresholds, then the analysis is inconclusive.

3. Results and discussion

3.1. Model structures returned by Bayesian network analysis

Using the log-likelihood criterion, the DAGs of the best fitting BNs were identical for the 5-year and 8-year formulations. Figure 3 shows the relations included in the best fitting BN (log-likelihood criterion) in comparison with the conceptual model presented in Figure 2, where relations not included in the fitted BN are greyed out. Table 3 provides an indication of the accuracy of the fitted relations. As described in Section 2.5, the log-likelihood criterion is

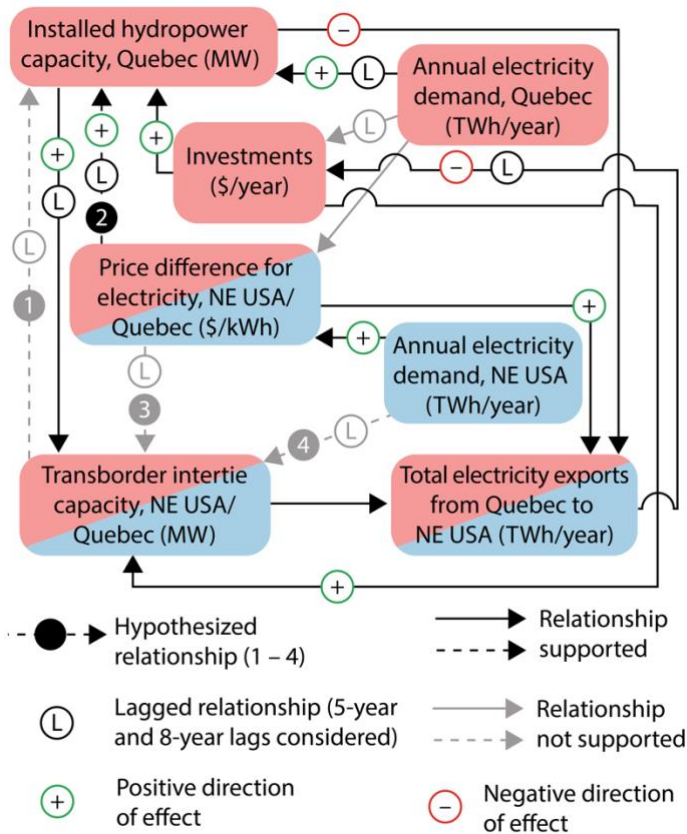


Figure 3: DAG that maximizes the log-likelihood scoring criterion (black lines) in comparison with the conceptual model in Figure 2 (including light grey lines). The same structure applies to both 5-year and 8-year models. Intertie \rightarrow Exports has an ambiguous direction of effect as described in Section 3.2. Concept nodes are shaded red for Quebec, blue for the NE USA, and red/blue for transborder. Corresponding DAG is included in SI Figure S2B.

generally more permissive than AIC and BIC and thus less likely to falsely rule out relationships. Thus, hypotheses rejected using the log-likelihood criterion are unlikely to exist. The identical model structure returned by both 5- and 8-year model formulations suggests that results are not sensitive to the averaging/lag period retained.

The best fitting BN does not indicate that installed generation capacity depends on intertie capacity (Hypothesis 1). The best fitting BN does indicate that price difference between the northeastern U.S. and Quebec has an influence on installed generation capacity (Hypothesis 2), but not on intertie capacity (Hypothesis 3). Intertie capacity also does not seem to be influenced by U.S. electricity demand (Hypothesis 4). D-separation results (Table 4) confirm the conditional independence between intertie capacity and installed generation (Hypothesis 1). Other results are the same as presented in Figure 3, with the exception of the relationship between electricity demand in Quebec and investments.

Therefore, the assertion that transborder intertie capacity directly “causes” expansion of hydroelectric generation in Quebec is not supported by our analysis. We note, however, that expanded intertie capacity does influence electricity exports, which influences investments, and investments in turn influence installed capacity. Thus, expanded transborder intertie capacity appears to be one part of a broader evolving technological system with mutual interdependencies rather than a trigger of installed hydropower capacity per se. Yet, as described below, the ambiguous direction of effect along the causal path does not necessarily support the interpretation that expanded generation capacity is even a second- or higher-order result of expanded transmission.

Table 3: Summary of our BN modeling results: fitted relationships and corresponding performance metrics. Results generated using the AIC and BIC criteria are available in SI Tables S3 & S4 (AIC), and S5 & S6 (BIC). Variables are transformed following footnotes in Table 2.

Response	Causal (parent) variable(s)	5-year model		8-year model	
		r squared	Accuracy	r squared	Accuracy
INSTALLED	DEMAND _{QC} , INVESTMENT, PRICE	0.76	-	0.96	-
INTERTIE	INVESTMENT, INSTALLED	-	0.70	-	0.89
EXPORTS	PRICE, INSTALLED, INTERTIE	0.78	-	0.92	-
INVESTMENT	EXPORTS	-	0.76	-	0.96
PRICE	DEMAND _{US}	0.60	-	0.76	-

Table 4: Summary of the results when conditioning on parents for the unsupported links presented in Figure 2. Variables are transformed following footnotes in Table 2.

Response	Causal (parent) variable	Conditional independence results
INSTALLED	INTERTIE	Conditionally independent
INTERTIE	DEMAND _{US}	Conditionally independent
INTERTIE	PRICE	Conditionally independent
INVESTMENT	DEMAND _{QC}	Potential missing link
PRICE	DEMAND _{QC}	Conditionally independent

AIC and BIC models broadly agree with the results presented here. In AIC and BIC models, 5-year formulations were more detailed, likely because fewer observations were discarded in the creation of 5-year-lagged variables than 8-year-lagged variables. In the BIC models, Hypothesis 1 was supported, but the direction of effect was negative. Model structures generated using the AIC and BIC criteria are available in SI Figures S3 (AIC) and S4 (BIC). These figures demonstrate how stricter criteria, such as AIC or BIC, limit the model’s ability to identify edges that can be discovered using our data.

Figure 3 shows the signs of the fitted relations, indicating that most variables are positively influenced by their causal predictors. Supplemental figures characterizing the direction of effect of the different relations are included in the SI. SI Figure S5 shows that installed generation capacity increases if any of its predictors increase. SI Figure S6 shows that intertie capacity is positively impacted by increases in installed generation capacity and investment levels. SI Figure S7 shows that price difference is positively impacted by increases of average demand in the NE USA. By contrast, investments are negatively influenced by total exports in the previous time step, which in turn is negatively influenced by installed capacity (thus leading to an indirect positive relation between installed capacity and subsequent investments) as shown in SI Figure S8. SI Figure S9 shows that the relation between intertie capacity and total exports is ambiguous,

being positive or negative depending on the values of the other predictors of total exports: installed generation capacity and price difference.

3.2. Temporal evolution of the generation-transmission system

Our analysis suggests that there is no direct association between increased inertia capacity and increased generation capacity (Hypothesis 1). There is an indirect link through exports and investment, meaning that increased exports facilitated by increased inertia capacity allows investments in both generation and transmission infrastructure. Therefore, inertia capacity appears to play at most an indirect, ancillary role in decisions around generation expansion.

Instead, this analysis reveals that investments in installed capacity are driven by a combination of domestic demand and price signals in the form of a difference between electricity prices in the northeastern United States and Quebec (Hypothesis 2). These price signals also drive export decisions over existing infrastructure. The significant reserve capacity of Hydro-Québec (up to 177 TWh) allows for selective exports at times of relative greater prices in the U.S (Hydro-Québec, 2020).

While inertia capacity does not directly drive installed generation capacity, our analysis reveals that installed generation may partially drive inertia capacity. This may correspond to Hydro-Québec's seeking markets for excess supply; hydropower projects are likely to be overdesigned in order to guarantee the ability to meet local demand and to supply existing contracts, potentially posing a choice between non-revenue spills and pursuit of export opportunities. We do not find evidence that inertia capacity is the direct consequence of price signals (Hypothesis 3) or U.S. demand (Hypothesis 4). However, it may be a second-order consequence of these variables via the role of price signals on installed capacity.

As described earlier, the premise that increased transborder transmission capacity stimulates increased generation in Quebec has been used to argue for increased scope of environmental impact assessment under NEPA (Birchard, 2017) and to attribute greenhouse gas emissions from reservoirs to proposed transmission projects (New York State Energy Research and Development Authority, 2021). This premise has also adversely affected support for such projects among environmental stakeholders whose support is important for achieving decarbonization of the electrical sector (Webster, 2022). Overall, this analysis supports a contrary view, i.e., that new transborder transmission projects should be considered independently from the suite of environmental and health impacts associated with reservoir construction.

3.3. Implications for causal inference methodologies in sociotechnical systems

This analysis suggests that formal causal inference methodologies may be used to understand evolving sociotechnical systems more broadly, for example, to scope environmental impact assessment and to build consensus regarding the dynamics of a complex social system. Because sociotechnical systems in general feature complex feedbacks, plausible narrative claims can be advanced for many alternative causal interpretations across a wide range of settings including the energy system (studied here), urban housing supply and affordability (Li, 2021), and investments in resource conservation and protection of environmental resources (Owens et al., 2022). We

posited earlier that formal causal inference methodologies could help resolve debates around and build consensus over the most parsimonious causal structures to overlay on complex systems where “everything is connected”.

We have demonstrated several modeling and interpretation approaches that may facilitate the use of Bayesian network analysis in other contexts. This includes the consideration of multiple BN algorithms, models and the interpretation of evidentiary support for hypothesized relationships on the basis of (1) agreement across models for a given hypothesized relationship and (2) whether it manifests as part of a causal structure with a plausible mechanistic interpretation. We have endeavored to describe evidence in support of potential causal relationships on the basis of a holistic analysis that considers multiple modeling choices and alternative causal structures, accepting that certain subjective choices may have significant effects on certain conclusions.

In certain cases, conclusions about features of the causal network may be robust to a wide variety of modeling choices. This was illustrated in this case study by our conclusion that hydroelectric generation in Canada is not the outcome of increased transborder intertie capacity, despite a plausible narrative claim advanced by expert stakeholders. In that case, our conclusions are robust to all possible models considered and thus seem robust enough to dismiss this assertion. For example, we failed to find evidence for this assertion across model formulations that varied in averaging/lag periods assumed and BN algorithm retained.

Conversely, our analysis suggests that these modeling choices can affect network structure in ways that could change the interpretation of causal dynamics in other settings. For example, our analysis based on the BIC criterion returns subtly different network structures when 5-year lag/averaging periods are considered vs. 8-year periods (SI Figure S10). In this analysis, data availability and the objective of ruling out asserted links suggested the BIC criterion was not well-suited. As in other types of quantitative modeling, professional judgment is required to exercise subjective decisions to interpret potentially contradictory results across model formulations.

The data available to parameterize a model clearly influence model predictions, and data are usually fragmentary and incomplete. In the setting of BNs, this may manifest as an unobserved counterfactual, creating uncertainties around a causal relationship between two nodes. For example, in the period 1979-2021, the price difference between Quebec and New York/New England was always positive (Figure 4), even while the magnitude of this difference varied. This

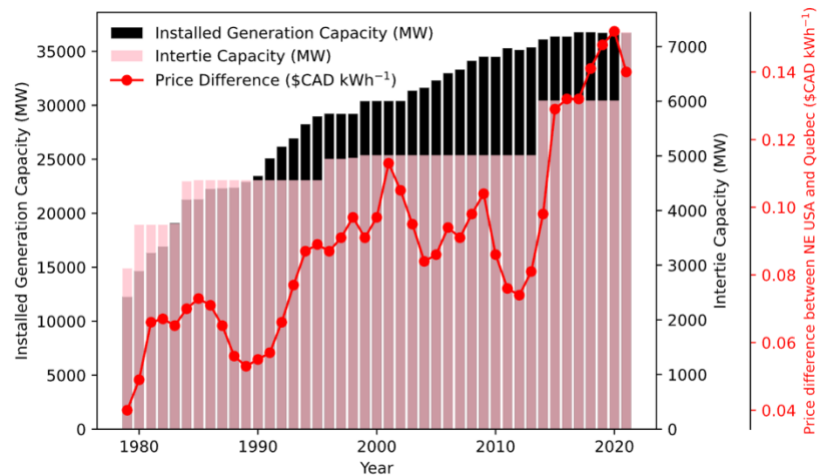


Figure 4: Time series of installed generation capacity and intertie capacity, and of retail electricity price differences between Quebec and New York and New England (average) 1979-2021.

limits the range of conditions over which the model may be valid. The shapes of the distributions of available data furthermore required extensive transformation to respect the assumptions of Bayesian analysis as summarized in Table 2 and described in Section 2.2. These transformations, though necessary to respect the assumptions of Bayesian analysis, result in a loss of information that increase uncertainties in any model returned.

BN analysis is subject to the same limitations as any graphical modeling strategy, and the use of these tools to describe evolving sociotechnical and socioenvironmental systems presents several inherent challenges. In particular, such systems have no inherent temporal beginning or end, feature multiple feedbacks across temporal and spatial scales, are characterized by evidence generated by a range of methodological traditions, and feature “mechanisms” that can be articulated at arbitrary levels of detail (Calder et al., 2020). Conceptual models for such systems thus necessarily reflect the judgments and specific decision context of the people who create these conceptual models.

As we have demonstrated here, these challenges can be compounded by the application of quantitative analysis, which necessarily embeds decisions made by modelers. This includes approaches to transforming and normalizing data and the selection of models, but also subjective elements of interpretation, for example, the description of results that conflict across model implementations with different BN learning algorithms. These are likely to be compounded by disagreements over the precise meaning of “reasonably foreseeable” and “reasonably close” in the application of NEPA and other institutional features that govern the interpretation of quantitative information, but that is outside the scope of this analysis.

4. Ethics declaration

The authors declare no competing interests.

5. Data and computer code availability statement

Data and computer code are available via GitHub. For the latest updates, visit this project’s [GitHub page](#).

6. Author contribution statement

A.M. contributed to conceptualization, data collection, data analysis, methodology, visualization, computer code development and manuscript development (drafting, reviewing, and editing). M.B. contributed to data analysis, methodology, computer code development and manuscript development (reviewing and editing). R.C. contributed to conceptualization, data analysis, visualization, computer code development, manuscript development (drafting, reviewing, and editing), management and supervision.

7. Literature Cited

Ansar, A., Flyvbjerg, B., Budzier, A., & Lunn, D. (2014). Should we build more large dams?

The actual costs of hydropower megaproject development. *Energy Policy*, 69, 43–56.

<https://doi.org/10.1016/j.enpol.2013.10.069>

- Appeal of Northern Pass Transmission, LLC & a., 172 NH 385 (Supreme Court of New Hampshire July 19, 2019). <https://law.justia.com/cases/new-hampshire/supreme-court/2019/2018-0468.html>
- Arif, S., & MacNeil, M. A. (2022). Utilizing causal diagrams across quasi-experimental approaches. *Ecosphere*, 13(4), e4009. <https://doi.org/10.1002/ecs2.4009>
- Beuzen, T., Marshall, L., & Splinter, K. D. (2018). A comparison of methods for discretizing continuous variables in Bayesian Networks. *Environmental Modelling & Software*, 108, 61–66. <https://doi.org/10.1016/j.envsoft.2018.07.007>
- Birchard, M. (2017). *Supplemental Comments of CLF on DEIS and SDEIS, Northern Pass Transmission LLC, Presidential Permit Application, OE Docket No. PP-371*. Conservation Law Foundation.
- Border Power Plant Working Group v. Department of Energy, 260 F. Supp. 2d 997 ____ (US District Court for the Southern District of California 2003). <https://law.justia.com/cases/federal/district-courts/FSupp2/260/997/2578803/>
- Calder, R. S. D., Borsuk, M. E., & Robinson, C. (2020). Analysis of environmental and economic impacts of hydropower imports for New York City through 2050. *Duke University, NI R 20-12*. <https://nicholasinstitute.duke.edu/publications/analysis-environmental-and-economic-impacts-hydropower-imports-new-york-city-through>
- Calder, R. S. D., Robinson, C. S., & Borsuk, M. E. (2022). Total Social Costs and Benefits of Long-Distance Hydropower Transmission. *Environmental Science & Technology*, 56(24), 17510–17522. <https://doi.org/10.1021/acs.est.2c06221>

- Calder, R. S. D., Schartup, A. T., Li, M., Valberg, A. P., Balcom, P. H., & Sunderland, E. M. (2016). Future Impacts of Hydroelectric Power Development on Methylmercury Exposures of Canadian Indigenous Communities. *Environmental Science & Technology*, *50*(23), 13115–13122. <https://doi.org/10.1021/acs.est.6b04447>
- Cheng, J., Greiner, R., Kelly, J., Bell, D., & Liu, W. (2002). Learning Bayesian networks from data: An information-theory based approach. *Artificial Intelligence*, *137*(1–2), 43–90. [https://doi.org/10.1016/S0004-3702\(02\)00191-1](https://doi.org/10.1016/S0004-3702(02)00191-1)
- Colburn, J. E. (2016). The Risk in Discretion: Substantive NEPA’s Significance. *Columbia Journal of Environmental Law*, *41*(1), Article 1. <https://doi.org/10.7916/cjel.v41i1.3569>
- Council on Environmental Quality. (2020). *Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act* (CEQ-2019-0003; pp. 43304-43376 (73 pages)). <https://www.federalregister.gov/documents/2020/07/16/2020-15179/update-to-the-regulations-implementing-the-procedural-provisions-of-the-national-environmental>
- Council on Environmental Quality. (2021). *National Environmental Policy Act Implementing Regulations Revisions* (CEQ-2021-0002; pp. 55757-55769 (13 pages)). <https://www.federalregister.gov/documents/2021/10/07/2021-21867/national-environmental-policy-act-implementing-regulations-revisions>
- Curran, M. A., Mann, M., & Norris, G. (2005). The international workshop on electricity data for life cycle inventories. *Journal of Cleaner Production*, *13*(8), 853–862. <https://doi.org/10.1016/j.jclepro.2002.03.001>

- Dimanchev, E. G., Hodge, J. L., & Parsons, J. E. (2021). The role of hydropower reservoirs in deep decarbonization policy. *Energy Policy*, 155, 112369.
<https://doi.org/10.1016/j.enpol.2021.112369>
- Ding, J., & Rebai, A. (2010). *Probabilistic Inferences in Bayesian Networks*. Sciyo.
<https://doi.org/10.5772/258>
- Ekvall, T. (2019). *Attributional and consequential life cycle assessment*. IntechOpen.
https://books.google.com/books?hl=en&lr=&id=yJj8DwAAQBAJ&oi=fnd&pg=PA41&ots=4uGARjVEYk&sig=P4ejPx2879tGDB0_XvpTUx97NQE
- Federal Reserve Board. (2023, March 20). *US-Canada Dollar Exchange Rate*.
<https://www.federalreserve.gov/datadownload/Download.aspx?rel=H10&series=2e3510c7c810ec01030aa1e14c9f361b&filetype=sheet&label=include&layout=seriescolumn&from=01/01/1971&to=12/31/2022>
- Fell, R., MacGregor, P., Stapledon, D., & Bell, G. (2005). *Geotechnical Engineering of Dams*. CRC Press. <https://www.routledge.com/Geotechnical-Engineering-of-Dams/Fell-MacGregor-Stapledon-Bell-Foster/p/book/9781138749344>
- Government of Newfoundland and Labrador. (2012). *Sanction of the Muskrat Falls Development*. Commission of Inquiry Respecting the Muskrat Falls Project.
<https://www.muskatfallsinquiry.ca/files/P-00067.pdf>
- Gronendyke, K. (2018). *Baker-Polito Administration Announces Selection of Project to Bring Clean Energy to the Commonwealth*. Commonwealth of Massachusetts, Executive Office

of Energy and Environmental Affairs.

<https://archives.lib.state.ma.us/handle/2452/755982>

Gutman, R., Marchenko, P. P., & Dunlop, R. D. (1979). Analytical Development of Loadability Characteristics for EHV and UHV Transmission Lines. *IEEE Transactions on Power Apparatus and Systems, PAS-98(2)*, 606–617. <https://doi.org/10.1109/TPAS.1979.319410>

Health Canada. (2011). *Review of the lower Churchill hydroelectric development project environmental impact statement*. Health Canada.

Hernan, M. A., & Robins, J. M. (2023). *Causal Inference: What If*. CRC Press.

https://www.hsph.harvard.edu/miguel-hernan/wp-content/uploads/sites/1268/2023/10/hernanrobins_WhatIf_30sep23.pdf

Herza, J., Ashley, M., & Thorp, J. (2018, September 28). *Factor of Safety?—Do we use it correctly?* https://www.researchgate.net/publication/327920961_Factor_of_Safety-Do_we_use_it_correctly

Hydro-Québec. (2020). *Cue Card 2019—2020*. Hydro-Québec.

https://www.hydroquebec.com/data/documents-donnees/pdf/2020G106A_Info-carte_301-acc.pdf

Hydro-Québec. (2022a). *Annual report 2022—Rapport annuel 2022* (p. 91). Hydro-Québec.

<https://www.hydroquebec.com/about/financial-results/annual-report.html>

- Hydro-Québec. (2022b). *Comparison of Electricity Prices in Major North American Cities*.
Hydro-Québec. <https://www.hydroquebec.com/data/documents-donnees/pdf/comparison-electricity-prices.pdf>
- Kitchen, W. H., & Ronayne, M. (2013). The Ilisu Dam Environmental Impact Assessment Report: Review and critique. *Public Archaeology*, 2(2), 101–116.
<https://doi.org/10.1179/pua.2002.2.2.101>
- Li, X. (2021). Do new housing units in your backyard raise your rents? *Journal of Economic Geography*, 22(6), 1309–1352. <https://doi.org/10.1093/jeg/lbab034>
- Lovering, J., Swain, M., Blomqvist, L., & Hernandez, R. R. (2022). Land-use intensity of electricity production and tomorrow’s energy landscape. *PLOS ONE*, 17(7), e0270155.
<https://doi.org/10.1371/journal.pone.0270155>
- Maine Department of Environmental Protection. (2021). *Central Maine Power Co. & NECEC Transmission, LLC, License Suspension Proceeding, Decision and Order 12*. State of Maine Department of Environmental Protection.
<https://www.maine.gov/dep/ftp/projects/necec/SuspensionProceeding/2021-11-23Final%20Order%20Revised.pdf>
- Morgan, R. K. (2012). Environmental impact assessment: The state of the art. *Impact Assessment and Project Appraisal*, 30(1), 5–14. <https://doi.org/10.1080/14615517.2012.661557>
- Natural Resources Canada. (2009). *Lower Churchill EIS Review Submission*. Impact Assessment Agency of Canada. <https://www.ceaa-acee.gc.ca/050/documents/35087/35087E.pdf>

Natural Resources Canada. (2023). *Energy Fact Book* (M136-1E-PDF; p. 59). NRCan.

https://natural-resources.canada.ca/sites/nrcan/files/energy/energy_fact/2022-2023/PDF/Energy-factbook-2022-2023_EN.pdf

NECEC Transmission LLC et al. V. Bureau of Parks and Lands et al., BCD-21-416 (Maine Business and Consumer Court April 27, 2022).

<https://www.courts.maine.gov/news/necec/index.html>

Needham, C. J., Bradford, J. R., Bulpitt, A. J., & Westhead, D. R. (2007). A Primer on Learning in Bayesian Networks for Computational Biology. *PLOS Computational Biology*, 3(8), e129. <https://doi.org/10.1371/journal.pcbi.0030129>

New York State Energy Research and Development Authority. (2021). *Appendix C – Cost analysis. Petition regarding agreements for procurement of Tier 4 renewable energy certificates* (Case 15-E-0302). NYSERDA.

<https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?Mattercaseno=15-E-0302>

Nogueira, A. R., Pugnana, A., Ruggieri, S., Pedreschi, D., & Gama, J. (2022). Methods and tools for causal discovery and causal inference. *WIREs Data Mining and Knowledge Discovery*, 12(2), e1449. <https://doi.org/10.1002/widm.1449>

Owens, K., Carmody, E., Grafton, Q., O'Donnell, E., Wheeler, S., Godden, L., Allen, R., Lyster, R., Steduto, P., Jiang, Q., Kingsford, R., & Quiggin, J. (2022). Delivering global water security: Embedding water justice as a response to increased irrigation efficiency. *WIREs Water*, 9(6), e1608. <https://doi.org/10.1002/wat2.1608>

- Paul, W. L. (2011). A causal modelling approach to spatial and temporal confounding in environmental impact studies. *Environmetrics*, 22(5), 626–638.
<https://doi.org/10.1002/env.1111>
- Pearl, J. (1995). Causal diagrams for empirical research. *Biometrika*, 82(4), 669–688.
<https://doi.org/10.2307/2337329>
- Pearl, J. (2000). *Causality: Models, reasoning, and inference* (2nd ed.). Cambridge University Press, New York, second edition, reprint 2009.
<https://doi.org/10.1017/CBO9780511803161>
- Peeters, L. J. M., Holland, K. L., Huddleston-Holmes, C., & Boulton, A. J. (2022). A spatial causal network approach for multi-stressor risk analysis and mapping for environmental impact assessments. *Science of The Total Environment*, 802, 149845.
<https://doi.org/10.1016/j.scitotenv.2021.149845>
- Ripley, B., & Venables, W. N. (2003). *Modern Applied Statistics with S (MASS library)* (7.3-60) [R]. <http://www.stats.ox.ac.uk/pub/MASS4/>
- Rosenberg, D. M., Berkes, F., Bodaly, R. A., Hecky, R. E., Kelly, C. A., & Rudd, J. W. (1997). Large-scale impacts of hydroelectric development. *Environmental Reviews*, 5(1), 27–54.
<https://doi.org/10.1139/a97-001>
- Sabin Center for Climate Change Law. (2023). *U.S. Climate Change Litigation*. Columbia Law School; Arnold & Porter. <http://climatecasechart.com/us-climate-change-litigation/>

- Scutari, M., & Denis, J.-B. (2021). *Bayesian Networks: With Examples in R* (2nd edition). Routledge. <https://www.routledge.com/Bayesian-Networks-With-Examples-in-R/Scutari-Denis/p/book/9780429347436>
- Scutari, M., Silander, T., & Ness, R. (2023). *Bayesian Network Structure Learning, Parameter Learning and Inference* (4.8.3) [R]. <https://www.bnlearn.com/>
- Snyder, J. (2018, April 19). “Without exports, our profits are in trouble”: Hydro-Quebec plugs into U.S. markets for growth. *Financial Post*. <https://financialpost.com/commodities/energy/without-exports-our-profits-are-in-trouble-hydro-quebec-plugs-into-u-s-markets-for-growth>
- Spirtes, P., Glymour, C., & Scheines, R. (2001). *Causation, Prediction, and Search*. The MIT Press. <https://doi.org/10.7551/mitpress/1754.001.0001>
- Stedinger, J. R., Sule, B. F., & Loucks, D. P. (1984). Stochastic dynamic programming models for reservoir operation optimization. *Water Resources Research*, 20(11), 1499–1505. <https://doi.org/10.1029/WR020i011p01499>
- Su, C., Andrew, A., Karagas, M. R., & Borsuk, M. E. (2013). Using Bayesian networks to discover relations between genes, environment, and disease. *BioData Mining*, 6(1), 6. <https://doi.org/10.1186/1756-0381-6-6>
- Tsamardinos, I., Brown, L. E., & Aliferis, C. F. (2006). The max-min hill-climbing Bayesian network structure learning algorithm. *Machine Learning*, 65(1), 31–78. <https://doi.org/10.1007/s10994-006-6889-7>

- U.S. Department of Energy. (1979–2021). *Archived Presidential Permits, Grid Deployment Office*. <https://www.energy.gov/gdo/archived-presidential-permits>
- U.S. Department of Energy. (2016). *Hydropower Vision Report, Water Power Technologies Office*. Water Power Technologies Office.
<https://www.energy.gov/eere/water/articles/hydropower-vision-report-full-report>
- U.S. Department of Energy. (2017). *Record of Decision for Issuing a Presidential Permit to Northern Pass Transmission LLC for the Northern Pass Transmission Line Project, Office of Electricity Delivery and Energy Reliability* (OE Docket No 371; pp. 55595-55599 (5 pages)). <https://www.federalregister.gov/documents/2017/11/22/2017-25254/record-of-decision-for-issuing-a-presidential-permit-to-northern-pass-transmission-llc-for-the>
- U.S. Energy Information Administration. (2022, October 6). *EIA-861 Annual Electric Power Industry Report*. <https://www.eia.gov/electricity/data/state/>
- Warner, S., & Coppinger, R. (1999). *Hydroelectric power development at James Bay: Establishing a frame of reference*. In: J.F. Hornig, ed. *Social and Environmental Impacts of the James Bay Hydroelectric Project*. Hornig. McGill-Queens University Press.
<https://www.mqup.ca/social-and-environmental-impacts-of-the-james-bay-hydroelectric-project-products-9780773518377.php>
- Wathern, P. (1990). An introductory guide to Eia. In *Environmental Impact Assessment* (1st ed., pp. 3–30). Routledge.

<https://www.taylorfrancis.com/books/edit/10.4324/9780203409978/environmental-impact-assessment-peter-wathern>

Webster, R. (2022). *Comments of Riverkeeper Regarding Proposed Tier 4 Contract Award to the Champlain Hudson Power Express Project*. Riverkeeper.

<https://www.riverkeeper.org/wp-content/uploads/2022/02/2022.02.07-RvK-CHPE-Tier-4-comments.pdf>

Wright, A. J., Dolman, S. J., Jasny, M., Parsons, E. C. M., Schiedek, D., & Young, S. B. (2013).

Myth and Momentum: A Critique of Environmental Impact Assessments. 2013.

<https://doi.org/10.4236/jep.2013.48A2009>