Future Energy Systems | NATIONAL PETROLEUM COUNCIL

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Bottleneck to Breakthrough: A Permitting Blueprint to Build

The National Petroleum Council's (NPC) 2025 report *Bottleneck to Breakthrough: A Permitting Blueprint to Build* contains practical solutions to modernize permitting and catalyze investment in America's energy infrastructure. Conducted at the request of Secretary of Energy Chris Wright, this study analyzes the nation's historic surge in energy demand and identifies the policy reforms needed to streamline permitting for the infrastructure required to meet it. The NPC's report notes that demand pressures have outpaced infrastructure capacity and made permitting reform an essential ingredient for U.S. energy reliability and competitiveness. The NPC concludes that inefficient, unpredictable permitting processes are delaying approvals for essential energy infrastructure, threatening affordability, reliability, and national security. It recommends a set of solutions that would enable infrastructure development to occur sooner to strengthen energy reliability and support U.S. competitiveness around the world.

Permitting Study Focal Points

- Recent major economic and geopolitical developments affecting energy delivery and demand
- Inefficiencies experienced under existing permitting laws, processes and coordination efforts
- Administrative and legislative reforms to accelerate approvals without compromising environmental protection

Challenges identified

NPC identifies systemic permitting barriers that delay timely approvals and hinder efficient construction of energy infrasture, including:

- ***Lengthy, fragmented reviews.*** Federal, state, and local processes overlap, producing multi-year delays that inflate costs and discourage investment
- ***Litigation-driven delays.*** Legal challenges under NEPA and Clean Water Act have become frequent tools for delay rather than advancing environmental protection
- ***Regulatory inconsistency.*** Agencies apply rules differently, creating uncertainty for developers
- ***Capacity shortfalls.*** Federal agencies often lack resources needed for timely permit reviews due to process complexity and the threat of litigation.
- ***Infrastructure bottlenecks.*** Pipeline constraints drive up consumer energy prices, restrict gas-to-market flows, and threaten reliability

Conclusions

The NPC warns that without reform, the U.S. risks higher energy prices, reliability challenges, and slower economic growth. Its recommendations would create a permitting regime that is faster, more transparent, and legally durable—enabling critical energy infrastructure while maintaining environmental protection and public trust.

Request a briefing at outreach@npc.org

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Key Findings & Recommendations

The report urges action on near-term procedural improvements and challenges policymakers to explore and adopt a long-term overhaul to create a durable, predictable permitting system balancing three imperatives: build, protect, and engage.

Permitting Blueprint

To create a durable, effective permitting system that meets the United States' expanding energy needs, impactful policy change is needed. By modernizing the permitting framework, the United States can unlock investment, create jobs, boost competitiveness, and continue to act as a stabilizing force against geopolitical unrest.

Clarify and Modernize NEPA

- Amend NEPA to reaffirm its procedural nature and limit reviews to direct, foreseeable impacts within agency authority
- Reduce redundant reviews and develop integrated handbooks showing alignment of NEPA with other statutes

Streamline Clean Water Act Permitting

- Limit state Section 401 reviews to direct water quality impacts; enforce one-year statutory deadlines
- Extend U.S. Army Corps Nationwide Permit renewals from five to 10 years for program durability

Judicial and Legislative Reform

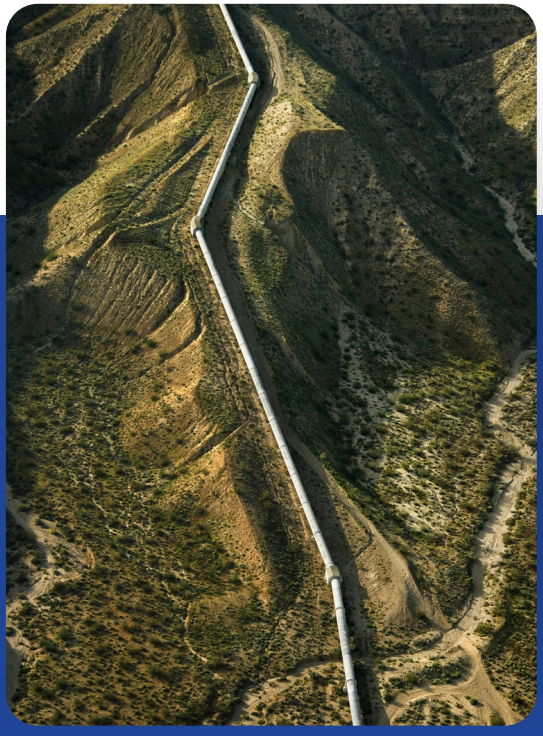
- Establish firm timelines for legal challenges and confine remedies to procedural corrections, not project stoppages

Administrative and Agency Actions

- Enforce FERC's 90-day authorization deadline for post environmental review
- Increase cost thresholds and expand eligibility under FERC's blanket certificate program
- Expand use of categorical exclusions and permit-by-rule systems for low-impact, routine projects

Initiating a New Framework

- Explore and adopt a new system for certain interstate infrastructure systems that includes "functional equivalency" for NEPA and a unified federal approval for projects.



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