

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

ISO New England Inc.;
Participating Transmission
Owners Administrative Committee;
Emera Maine;
Town of Braintree Electric Light Department;
NSTAR Electric Company;
Chicopee Electric Light Department;
Central Maine Power Company;
Maine Electric Power Company (MEPCO);
Connecticut Municipal Electric Energy Cooperative & Connecticut Transmission Municipal
Electric Energy Cooperative;
The City of Holyoke Gas and Electric Department
New Hampshire Transmission, LLC;
Green Mountain Power Corporation;
Massachusetts Municipal Wholesale Electric Company;
New England Power Company, d/b/a National Grid;
New Hampshire Electric Cooperative, Inc.;
Eversource Energy Service Company as agent for: The Connecticut Light and Power Company,
Western Massachusetts Electric Company, and Public Service Company of New Hampshire;
Town of Hudson Light and Power Department;
Town of Middleborough Gas & Electric Department;
Town of Norwood Municipal Light Department;
Town of Reading Municipal Light Department;
Town of Wallingford (CT) Electric Division;
Taunton Municipal Lighting Plant;
The United Illuminating Company;
Unitil Energy Systems, Inc. and Fitchburg Gas and Electric Light Company;
Vermont Electric Cooperative, Inc.;
Vermont Electric Power Company, Inc. and Vermont Transco, LLC;
Vermont Public Power Supply Authority;
Shrewsbury Electric and Cable Operations

Docket Nos. ER18-2235-000
EL16-19-000

**REPLY COMMENTS OF THE
NEW ENGLAND STATES COMMITTEE ON ELECTRICITY**

Pursuant to Rule 602(f) of the Rules of Practice and Procedure of the Federal Energy
Regulatory Commission (“Commission” or “FERC”), 18 C.F.R. § 385.602(f), and the September
10, 2018 Order of the Chief Judge Extending Time to File Reply Comments, the New England

States Committee on Electricity (“NESCOE”) submits these reply comments on the Joint Offer of Settlement (“Settlement”) filed by New England transmission owners, NESCOE, New England state public utility commissions, and various other New England state governmental agencies in the above captioned proceeding.¹

In NESCOE’s experience as an active participant in the consumer-interested party (“CIP”) coalition, NESCOE and other CIPs were represented by knowledgeable technical experts and counsel throughout the settlement process. The Commission should reject any suggestion that CIPs were not familiar with the issues relating to the Settlement or that they reached a settlement for any reason other than their view that it is in the best interests of consumers.² Such assertions are unfounded. Like all settlements, this Settlement reflects trade-offs and compromises among parties. Nine formal settlement conferences were held over the course of what became a lengthy, complex, and at times contentious settlement, with several informal technical sessions and other meetings held between conferences. As an overall package, the Settlement garnered broad regional support. In addition to the unanimous support of New England states, a cross-section of market participants, end users, and other regional stakeholders have voiced strong support for the Settlement.³

¹ On September 6, 2018, NESCOE submitted comments in this proceeding (“NESCOE Comments”). The NESCOE Comments set forth NESCOE’s perspective on the Settlement in greater detail. NESCOE’s silence on any issues raised in the pleadings of other parties or participants should not be construed as agreement on those issues.

² *See, e.g.*, Initial Comments of Municipal PTF Owners in Opposition to Proposed Settlement, Docket Nos. ER18-2235-000 et al. (filed Sept. 6, 2018), at 10; Initial Comments of the Commission Trial Staff Opposing the Offer of Settlement and Settlement Agreement as Filed, Docket Nos. ER18-2235-000 et al. (filed Sept. 6, 2018), at 76.

³ *See* Reply Comments of the New England Power Pool Participants Committee, Docket Nos. ER18-2235-000 et al. (filed Sept. 13, 2018), at 4 (supporting the Settlement with a supermajority of 95.72% of participants in favor).

NESCOE's support for the Settlement is conditioned on the adoption of reforms that, as discussed in the NESCOE Comments, provide consumers with greater confidence in the accuracy of the formula rate, enhance transparency, and establish a formal structure for challenging formula rate inputs. For example, the transition to a single revenue requirement closes a significant transparency gap in New England. As the NESCOE Comments explain, local transmission service schedules can vary and timing differences in these schedules can impede the ability of consumer representatives to effectively analyze inputs into the formula rate. The Settlement establishes a uniformity across New England that eliminates the transparency gap, adopting a single process for reviewing both regional and local rates. Importantly, it also includes protocols to challenge rate inputs.

NESCOE reiterates its supports for the Settlement and respectfully requests that the settlement judge certify, and the Commission approve, the Settlement without modification or condition.

Respectfully Submitted,

/s/ Jason Marshall

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Dated: September 28, 2018

CERTIFICATE OF SERVICE

In accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served by electronic mail a copy of the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Cambridge, Massachusetts this 28th day of September, 2018.

Respectfully submitted,

/s/ Jason Marshall

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