

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

ISO New England Inc.

)

Docket No. EL18-182-000

**ANSWER OF THE  
NEW ENGLAND STATES COMMITTEE ON ELECTRICITY  
IN SUPPORT OF THE MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission” or “FERC”), 18 C.F.R. § 385.213, the New England States Committee on Electricity (“NESCOE”) files this answer in support of the January 18, 2019 Motion for Extension of Time that ISO New England Inc. (“ISO-NE”) filed the above-captioned proceeding (“Extension Request”).<sup>1</sup>

The Extension Request asks the Commission to grant a brief extension of time—from July 1, 2019 to November 15, 2019—for ISO-NE’s filing of a long-term, market-based solution to address winter energy security concerns.<sup>2</sup> ISO-NE states that the request “will not adversely impact or jeopardize” the 2024-2025 implementation schedule, which corresponds with the fifteenth Forward Capacity Auction.<sup>3</sup>

Based on ISO-NE’s representation that the additional time will not affect ISO-NE’s implementation date, NESCOE supports the requested filing extension to November 15, 2019. The Extension Request sets forth ISO-NE’s conceptual approach to energy security over the

---

<sup>1</sup> NESCOE filed a timely motion to intervene in the above-referenced docket and is a party to this proceeding. *ISO New England Inc.*, 165 FERC ¶ 61,202 at P 7 (2018). Capitalized terms not defined in this filing are intended to have the meaning given to such terms in the ISO-NE Transmission, Markets and Services Tariff.

<sup>2</sup> Extension Request at 1-2, 6.

<sup>3</sup> *Id.* at 8. *See also id.* at 1.

longer-term horizon, explaining that the proposal includes multiple components and interrelated market rule changes.<sup>4</sup> As ISO-NE notes, NESCOE and others have requested information regarding the proposed approach and have raised a number of questions.<sup>5</sup> The time extension will enable ISO-NE to provide the analysis that states and stakeholders need to better understand the proposal's implications for system reliability, wholesale market structures and operations, and consumer costs, as well as any alternatives.<sup>6</sup> NESCOE emphasizes that these matters are of critical importance to the region. Accordingly, NESCOE urges ISO-NE to work with states and stakeholders during the extension period toward developing solutions that can be implemented without further delay.

For the reasons discussed herein, NESCOE respectfully requests that the Commission grant ISO-NE's requested extension of time for filing without implications on implementation timeframes.

Respectfully Submitted,

/s/ Jason Marshall

Jason Marshall  
General Counsel  
New England States Committee on Electricity  
655 Longmeadow Street  
Longmeadow, MA 01106  
Tel: (617) 913-0342  
Email: [jasonmarshall@nescoe.com](mailto:jasonmarshall@nescoe.com)

Dated: January 23, 2019

---

<sup>4</sup> *Id.* at 4-5.

<sup>5</sup> *Id.* at 5.

<sup>6</sup> *See id.*

## 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 23rd day of January, 2019.

*/s/ Jason Marshall* \_\_\_\_\_

Jason Marshall

General Counsel

New England States Committee on Electricity

655 Longmeadow Street

Longmeadow, MA 01106

Tel: (617) 913-0342

Email: [jasonmarshall@nescoe.com](mailto:jasonmarshall@nescoe.com)