

New England States Committee on Electricity

To: Don Gates, ISO-NE
From: NESCOE
Date: October 18, 2013
Subject: Comments on ISO-NE's Proposed Scope of Work for DGFWG

The New England States Committee on Electricity (NESCOE) provides the following comments to ISO-NE on its Distributed Generation Forecast Working Group (DGFWG) Proposed Scope of Work.

As the number of DG resources increase on the local distribution network they will provide more energy behind the meter and will reduce loads at the system level. However, information about the number and location of resources < 5 MW in size may not be known to ISO-NE at this time or in the future without a plan to account for these resources. Given the information states have about DG resources related to state-funded programs and the states' role in setting interconnection standards for resources on the local distribution network, it would be most constructive for the states' role in the DG forecast working group to be in partnership with ISO-NE. To that end, NESCOE recommends the following changes to the Proposed Scope of Work, which reflects the New England states objective in connection with the work of the DGFWG:

Objectives

In order to assist the ISO's development of a DG forecast, it established a stakeholder working group. A DG forecast will provide ISO planners and stakeholders with estimates of DG to be used in long-range planning, [such as transmission planning and resource adequacy assessment](#). The working group will provide input on DG forecast assumptions, data inputs, model validation, and feedback on the model results. Information shared through the DGFWG may also provide insight into some aspects of DG integration that may be useful for other planning and operational needs of the New England power system. [Given the complexity of forecasting DG penetration, the DGFWG will focus on addressing growth of DG \(particularly solar PV\) in planning studies in the near-term and will address any potential impacts to operations over the longer-term. Beginning in 2014 an initial DG forecast, which may be appropriately discounted to reflect uncertainty and differ from that implemented for the longer term, will be completed as part of the normal forecasting cycle. It will be published to accompany the traditional 10-year load forecast and energy efficiency forecast.](#)

Organization of WG and Timing

The DGFWG is chaired by a representative of ISO New England, and will not be a formal NEPOOL committee or subcommittee. [Given the significant state policies and programs to increase DG resources and the central role that states will play in providing ISO-NE with information about DG resources, ISO-NE will work closely with the states in organizing working group meetings.](#) Periodically, the DGFWG will provide updates to the Planning Advisory Committee and other committees as necessary. Meeting agendas and materials will be posted on the ISO website and advance notice will be provided to all interested parties.

The responsibility to produce the DG forecast rests with the ISO. The DGFWG will not be a voting body. The DGFWG will serve in an advisory role to the ISO, in accordance with the objectives stated above.

NESCOE recognizes that there are challenges to implementing a DG forecast, challenges that we will solve in a timely manner with shared knowledge and information between states, ISO-NE, and other working group members. We appreciate your consideration of these recommended changes and welcome a phone call to discuss DGFWG collaboration going forward.