

New England States
Committee on Electricity

To: Persons Requesting Additional Time to Comment on the *Coordinated Competitive Renewable Power Procurement Draft Work Plan*
From: NESCOE
Date: August 30, 2012
Subject: Response to Request for Extension of Time

Thank you for your recent correspondence in which you requested additional time to comment on NESCOE's Draft Work Plan in connection with Coordinated Competitive Renewable Power Procurement.¹

Coordinated Competitive Renewable Power Procurement is a process to allow one or more of the six New England states to meet their state-mandated renewable energy goals at the least total project cost for consumers. Coordinated Competitive Renewable Power Procurement does not increase or change individual state renewable energy goals. It is simply one potential tool by which states may encourage infrastructure to develop in a coordinated manner and identify projects that satisfy state renewable energy goals at the lowest cost to consumers.

Beginning in 2009, the New England Governors have on several occasions asked NESCOE to explore the potential for the New England States to coordinate renewable power procurement. Most recently, the six New England Governors asked NESCOE to create a Work Plan that explains how such coordination could occur. The Draft Work Plan NESCOE released for public comment outlines such a process and identifies open questions.

The Draft Work Plan is just that - a preliminary list of steps and open issues that would

¹ NESCOE has received a number of largely identical requests for an extension of time as follows:

I am writing in response to NESCOE's request for comments related to a *Coordinated Competitive Renewable Power Procurement Draft* work plan.

I was only made aware of this issue in the last week. As a ratepayer residing in the New England region, I have significant concerns relating to the cost of any plan involving government procure of new renewable energy and attendant transmission. I intend to offer detail comments on NESCOE's draft work plan, however, the deadline of August 31, 2012 is unreasonable.

Unless it is NESCOE's intent to discourage public comment, I strongly urge the Committee to extend the deadline for public comment to October 1, 2012.

Please let me know as soon as possible whether the Committee will be honoring my request.

Thank you very much for your attention to this important matter.

have to be resolved before states could issue a Request for Proposals (RFP) to renewable developers. NESCOE's purpose in issuing the Draft Work Plan for comment is to hear from interested persons their views on the proposed process. The Draft Work Plan does not address questions such as resource eligibility, the criteria by which projects would be judged or other important substantive considerations. It simply identifies the process through which states would consider such questions in the year ahead.

The Draft Work Plan does not – and indeed any Final Work Plan will not - commit any New England state to procure any renewable resources, in any amount or in any location. As contemplated by the Draft Work Plan, each state would make an independent decision about whether to procure any renewable resources, and if so which resources and at what prices, after they assess proposed projects and their costs at the very end of the process. Until that time, the Coordinated Competitive Renewable Power Procurement process does not commit any state to anything.

If the New England States proceed through the steps identified in the Draft Work Plan, resolve open issues and issue an RFP at some point in late 2013, any renewable energy project that comes forward and is selected by a state for a contract would still have to go through all state, regional, and federal processes for siting authority, interconnection, and sale into the electricity markets. The Coordinated Competitive Renewable Power Procurement process in no way changes the current rigorous state and federal processes that power projects must satisfy prior to commencing operation.

We had set an August 31, 2012 deadline for comments on this procedural document in order to conform with the timeline for further investigation set for us by the Governors; if you would like to offer comments thereafter, please provide those comments by mid-September because we expect to release a final work plan in October.

Thank you for your interest in this important matter.