

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

ISO New England Inc.)	
)	Docket Nos. ER16-946-000
)	

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

Pursuant to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) February 16, 2016 Combined Notice of Filings #2, the New England States Committee on Electricity (“NESCOE”) hereby files these comments in the above-captioned proceeding.¹ On February 16, 2016, ISO New England Inc. (“ISO-NE” or the “ISO”) and the Participating Transmission Owners filed with the Commission proposed revisions to the ISO-NE Open Access Transmission Tariff (“OATT”) to improve the generator interconnection process (the “Interconnection Filing”).² The Interconnection Filing refers to these proposed changes as the “Interconnection Process Improvements.”³

I. COMMENTS

The Interconnection Filing describes the foundational structure of ISO-NE’s interconnection rules—rooted in the Commission’s directives regarding the *pro forma* procedures and agreements—and the revisions made over the last decade to account for emerging regional needs.⁴ The Interconnection Process Improvements are informed by

¹ NESCOE filed a doc-less motion to intervene in this proceeding on February 18, 2016.

² 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 (the “Tariff”). The OATT is Section II of the Tariff.

³ Interconnection Filing, Transmittal Letter (“Transmittal Letter”), at 1-2.

⁴ *Id.* at 7-11.

experiences in implementing the interconnection rules.⁵ These include (1) delays in studying wind resources seeking to interconnect due to an existing exemption from reactive power requirements,⁶ (2) increased study time resulting from submission of technical data that failed to capture sufficient plant design information for wind and inverter-based generators early in the study process, as well as project modifications initiated after a study has commenced,⁷ and (3) various features of the current rules creating inefficiencies in processing interconnection requests.⁸ In short, the Interconnection Process Improvements are expected to make wind generation projects “more ‘study ready,’ similar to conventional generators.”⁹

NESCOE supports the Interconnection Process Improvements. These enhancements to the current rules, grounded in the region’s experiences, are designed to reduce study times by addressing a range of core issues that have caused delays and created inefficiencies in the interconnection process. In doing so, the new rules would facilitate the continued integration of wind resources into the ISO-NE system, enhancing competition in the energy markets and furthering state laws that foster the growth of renewable resources.

Importantly, as the Interconnection Filing explains, the proposed improvements to the interconnection process are not a panacea.¹⁰ ISO-NE has committed to initiating a second phase of work on interconnection issues this year, with a focus on infrastructure, cluster studies, and

⁵ *Id.* at 11-13.

⁶ *See* Interconnection Filing, Prepared Testimony of Mr. Alan McBride on Behalf of ISO New England Inc. (“McBride Testimony”), at 19-20. The Interconnection Filing references the Commission’s pending rulemaking regarding reactive power requirements and states that ISO-NE’s proposed rule changes in this area are consistent with the Commission’s proposed reforms “with limited exceptions that are necessary to address New England’s needs.” Transmittal Letter at 16.

⁷ *See* McBride Testimony at 22-23.

⁸ *See* Transmittal Letter at 13-14.

⁹ *Id.* at 13; McBride Testimony at 15.

¹⁰ *See* Transmittal Letter at 3-4, 12-13.

cost allocation.¹¹ NESCOE looks forward to the commencement of this phase II work and to participating actively in regional discussions in the development of further critical improvements to the interconnection process.

II. CONCLUSION

For the reasons stated herein, NESCOE respectfully requests that the Commission consider the above comments in this proceeding.

Respectfully submitted,

/s/ Jason Marshall

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¹¹ See *id.* at 4, 13.

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 8th day of March, 2016.

Respectfully submitted,

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