

| RSP17 Comment Form | | | | |
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| p. 13 of file, p. 1 of draft, also p. 153 of file p. 141 of draft | 1 Executive summary, later reoccurs in section 10.3.3 | NESCOE | <p>Last paragraph repeatedly uses the term subsidized in referring to resources that states have contracted with. This also occurs repeatedly in Section 10.3.3.</p> <p>Consistent with ISO-NE’s announced change to the “CASPR” name as part of the Markets Committee discussion, “sponsored” should be substituted for “subsidized” for all occurrences in the paper.</p> <p>Also suggest deleting footnote 2 or, alternatively, reference other materials on the issue of subsidies, e.g., Synapse presentation to IMAPP.</p> | |
| p 14 of file, p. 2 of draft | 1 Executive Summary | NESCOE | <p>First paragraph at the top of the page ends with the sentence: “The widespread use of these and other asynchronous resources (such as energy efficiency and photovoltaics), as opposed to traditional synchronized “spinning” resources, requires physical system improvements and structural changes to the industry.”</p> <p>We do not know what structural industry changes this refers to. The PAC has not discussed the structure of the electric industry.</p> | |

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| p. 17 of file, p. 5 of draft | 1.1.3.1 | NESCOE | Suggest the following clarifying edits: “Material changes were made to the ISO’s planning process going forward, incorporating into the <i>Transmission Planning Process Guide</i> the requirement for the ISO to solicit proposals for reliability projects that have a greater than three-year planning need and to issue requests for proposals (RFPs) when for market efficiency projects and or if federal, state, and local public policies drive transmission needs.” | |
| p. 25 of file, p. 13 of draft | 1.1.8 | NESCOE | Suggest the following clarifying edits: “In addition, the states have encouraged the development of energy storage.” | |

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| p. 25 of file, p. 13 of draft | 1.1.8 | NESCOE | <p>The following sentence should be deleted: “As states contract for new renewable resources, the wholesale market rules will need to be revised to ensure efficient price formation.”</p> <p>This language assigns blame to renewable resources as sole factor in price formation issues without basis or data to support such assignment. In fact, New England market participants identified attention to price formation as a priority issue that merits ISO-NE resources long before current and/or prospective state contracts with clean energy resources could have influenced such formation.</p> | |
| p. 26 of file, p. 14 of draft | 1.2 | NESCOE | <p>The following sentence should be revised: “The addition of renewables, however, suppresses energy market prices and may further encourage the retirement of traditional generating units.”</p> <p>This language provides an unbalanced and unfair characterization of renewables in the energy market. The use of the word “suppresses” infers intent to affect the energy markets.</p> <p>Suggest rewording as follows: “The addition of renewables and continued low natural gas prices, among other factors, could have a damping effect on energy market prices which may encourage the retirement of traditional generating units.”</p> | |

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| p. 82 of file, p. 70 of draft | 5.3 | NESCOE | <p>The language states that: “The changes added the requirement to solicit proposals for reliability projects that have a planning need longer than three years beyond the completion of the needs assessment and conduct requests for proposals (RFPs) when federal, state, and local public policies create the need for additional transmission.”</p> <p>Neither Order 1000 nor FERC’s compliance order for New England requires an RFP in relation to planning for policy-driven transmission needs. The ISO-NE compliance filing proposed, and FERC approved, a process in New England whereby ISO-NE <i>may</i> issue an RFP for policy-driven transmission solutions following the identification of policy-driven needs and one or more ISO-NE studies. <i>Even if</i> such needs are identified, ISO-NE is not required to issue an RFP after completing its study and discussing the study with the PAC. See, e.g., ISO-NE Transmission Planning Process Guide at 34, available at https://www.iso-ne.com/static-assets/documents/2017/04/transmission_planning_process_guide_4_6_2017.pdf.</p> <p>Suggest revising this sentence to conform to the tariff as follows: “The changes added the requirement to solicit proposals for reliability projects that have a planning need longer than three years beyond the completion of the needs assessment and conduct requests to implement a process for identifying and evaluating proposals (RFPs) when federal, state, and local public policies that create the need for additional transmission.”</p> | |

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| p. 82 of file, p. 70 of draft | 5.3 | NESCOE | <p>The language states that: “Since the effective date of the order, the ISO has completed several area needs assessments or has conducted an update to an already completed needs assessment. The results of all the needs assessments show that that time-sensitive and a few non-time-sensitive needs exist. Thus, the solutions study process has been used first to solve the time-sensitive needs, and the Competitive Solutions Process for the few non-time-sensitive needs has been placed on hold until the time-sensitive needs are addressed through the solutions study process. After the solutions have been identified for the time-sensitive needs, the ISO will begin a new needs assessment, which will include the preferred solutions for the time-sensitive needs and identify any remaining needs.”</p> <p>Suggest adding language to the end of this paragraph that reflects ISO-NE discussions with stakeholders: “ISO-NE has committed to discussions with stakeholders regarding the implications that solving for time-sensitive needs has on the Competitive Solutions Process.”</p> | |
| p. 83 of file, p. 71 of draft | 5.3 | NESCOE | <p>Suggest the following clarifying edit: “On May 1, 2017, NESCOE submitted a statement to the ISO that at this time no federal or state public policy requirements drive the need for a regionally developed transmission solution.”</p> | |

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| p. 102 of file, p. 90 of draft | 5.10 | NESCOE | Suggest the following clarifying edit: "The public policy process began in January 2017 and concluded in June with a finding that a public policy transmission study will not be pursued." | |
| P 149 of file, p. 137 of draft | 10.2 | NESCOE | <p>The title of the section is "Regional Initiatives". There are no regional initiatives. There are state initiatives and state coordination at the regional level.</p> <p>The title needs to be revised accordingly.</p> <p>Immediately following the title there is a sentence that states: "This section discusses several policies, laws, and activities at the regional level that affect the regional power system". There are no policies or laws at the regional level.</p> <p>The sentence should read: "This section discusses state laws several policies, laws, and activities at the regional level that affect the regional power system."</p> | |
| P 150 of file, p 138 of draft | 10.2.3 | NESCOE | <p>The first sentence of this section reads: "In November 2015, the three southern New England states, Massachusetts, Connecticut and Rhode Island, issued an RFP from clean energy resources and electric transmission developers to deliver additional supplies of renewable energy and large-scale hydropower to the New England power system."</p> <p>It should read: " In November 2015, the three southern New England states, Massachusetts, Connecticut and Rhode Island, issued an RFP from for clean energy resources and electric transmission developers to deliver additional</p> | |

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| | | | supplies of renewable energy and large-scale hydropower to the New England power system. | |
| p.156 of file, p.144 of draft | 10.4.4 | NESCOE | <p>In the second paragraph of this section there is a statement that currently reads: In 2018, the DPU will determine whether the winning bids are a cost-effective mechanism for procuring reliable renewable energy on a long-term basis, and if so, they will approve the contract(s).</p> <p>This should be amended as follows: In 2018, the EDCs will submit the contracts resulting from the RFP to the DPU. The DPU will determine whether the winning bids are a cost-effective mechanism for procuring reliable renewable energy on a long-term basis, and if so, they will approve the contract(s).</p> | |
| p. 156 of file, p. 144 of draft | 10.4.5 | NESCOE | <p>New Hampshire would suggest that the second sentence be changed to read as follows: “In addition, the New Hampshire Public Utilities Commission (NHPUC), in accordance with the 2014 State Energy Strategy and related legislation, opened a docket to study grid modernization. It also opened separate dockets to consider establishing an energy-efficiency resource standard and to develop an alternative net-metering tariff.” New Hampshire would also suggest additional language reading as follows: “In 2016, the NHPUC opened a docket to examine a petition submitted by a New Hampshire electric utility to purchase natural gas capacity on the proposed Access Northeast pipeline. The capacity purchased was to be resold to New England gas-fired generators for the purposes of lowering electric energy prices and enhancing power system reliability. The NHPUC dismissed the utility’s petition in October 2016 for being inconsistent with New Hampshire’s restructuring law.”</p> | |
| p. 157 of file, p. 145 of draft | 10.5 | NESCOE | <p>The first sentence of the second paragraph refers to “regional policy initiatives”. This should be changed to “states’ policy initiatives”</p> | |

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| Transparency | All | NESCOE | <p>As NESCOE has communicated in the past, the RSP is a publicly available document. The final RSP does not include information defined as CEII. For ease of stakeholder review and in the interest of transparency, ISO-NE should take steps to ensure the draft RSP does not include CEII before its release rather than classifying the entire draft RSP as CEII.</p> <p>Also in furtherance of transparency, ISO-NE's offer to conceal the names of stakeholders who offer comments in order to influence the RSP should be eliminated.</p> | |