

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

ISO New England Inc., New England	)	
	)	Docket No. ER19-444-000
Power Pool Participants Committee	)	
	)	

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

Pursuant to the Federal Energy Regulatory Commission’s (“Commission” or “FERC”) November 30, 2018 Notice of Filings #1, the New England States Committee on Electricity (“NESCOE”) hereby files these comments in the above-captioned proceeding.<sup>1</sup> On November 30, 2018, ISO New England Inc. (“ISO-NE” or the “ISO”) and the New England Power Pool Participants Committee (“NEPOOL”) jointly filed with the Commission proposed revisions to ISO-NE Market Rule 1 related to implementation of the ISO’s Competitive Auctions with Sponsored Policy Resources (“CASPR”) rules (the “CASPR-Related Changes”).<sup>2</sup> Among other things, the CASPR-Related Changes clarify that eligibility for the Renewable Technology Resource (“RTR”) exemption to the Minimum Offer Price Rule (“MOPR”) extends to certain renewable resources located in federal waters. NESCOE supports this change.

**I. COMMENTS**

ISO-NE proposes several market rule changes intended to further accommodate the requirements of state energy and environmental laws.<sup>3</sup> ISO-NE’s CASPR rules, effective for the

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<sup>1</sup> NESCOE filed a doc-less motion to intervene in this proceeding on December 3, 2018.

<sup>2</sup> Joint Filing of ISO New England Inc. and New England Power Pool regarding Conforming Changes to ISO Tariff for CASPR, Docket No. ER19-444-000 (filed Nov. 30, 2018) (“CASPR Revision Filing”). 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”). Market Rule 1 is Section III of the Tariff.

<sup>3</sup> See CASPR Revision Filing, Prepared Testimony of Mr. Matthew Brewster and Dr. Christopher Geissler on Behalf of ISO New England Inc., at 6.

first time in the next Forward Capacity Auction (“FCA”), offer Sponsored Policy Resources an additional means to obtain a Capacity Supply Obligation from existing resources that wish to permanently exit the market. To qualify for CASPR’s Substitution Auction, Sponsored Policy Resources must, *inter alia*, be a “renewable, clean or alternative energy resource” under a renewable, clean, or alternative energy portfolio standard or goal as of January 1, 2018.<sup>4</sup> The majority of the CASPR-Related Changes propose Tariff revisions that reflect the ongoing implementation of CASPR: clarifying the mechanics of participation, settlement, and financial assurance; attempting to curb uneconomic bidding behavior; and clarifying the treatment of CASPR results in resource adequacy and planning studies. NESCOE has no objection to these changes that conform the Tariff with CASPR’s ongoing implementation.

Consistent with ISO-NE’s implementation of CASPR, it proposes to clarify eligibility for the RTR exemption to the MOPR. Through the CASPR-Related Changes, ISO-NE clarifies that off-shore wind resources located in Federal waters, with a Point of Interconnection to the ISO-NE grid, are eligible for the RTR exemption. As confirmed in stakeholder discussions, this treatment is consistent with the original intent of the RTR exemption to capture off-shore wind resources and no market participant or stakeholder disputed this intent.<sup>5</sup> — Given these market expectations, as well as the active renewable energy development on the Outer Continental Shelf, the timely clarification of the Tariff with regard to RTR exemption eligibility is imperative to minimize disruption to the marketplace.

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<sup>4</sup> Section I.2.2. of the Tariff.

<sup>5</sup> See Minutes of the NEPOOL Markets Committee Meeting, Oct. 9-10, 2018, at 8 (“Comments from the stakeholders and a statement from the ISO indicated their agreement that NESCOE was fairly portraying the original intent of the relevant Tariff provisions.”). The majority of NEPOOL participants supported this clarifying change to the RTR exemption as part of the CASPR-Related Changes. See CASPR Revision Filing, Transmittal Letter, at 40-41 (stating that at its October 9-10, 2018 meeting, the NEPOOL Markets Committee voted to recommend that the NEPOOL Participants Committee support the revisions with a 75.24% Vote in favor and the NEPOOL Participants Committee, at its November 2, 2018 meeting, voted to support the CASPR-Related Changes based on a show of hands.).

## II. CONCLUSION

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

Respectfully submitted,

/s/ Benjamin S D'Antonio

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Date: December 21, 2018

## 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 Longmeadow, Massachusetts this 21st day of December, 2018.

Respectfully submitted,

/s/ Benjamin S D'Antonio

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