



New England States Committee on Electricity

To: ISO-NE
From: NESCOE
Date: April 13, 2021
Subject: Comments on 2021 Draft Updated Work Plan

The New England States Committee on Electricity (NESCOE) appreciates the opportunity to provide preliminary reactions to ISO New England’s (ISO-NE) Draft Updated 2021 Work Plan (Updated Work Plan), reviewed with NEPOOL officers, NESCOE and NECPUC representatives on March 30, 2021. NESCOE may provide additional input as the Updated Work Plan moves forward for discussion at the May 6, 2021 NEPOOL Participants Committee meeting.

In general, NESCOE appreciates ISO-NE prioritizing resources to assessing continued power system reliability, integrating clean energy and distributed energy resources, and potential wholesale market design changes. We offer brief comment on one item below.

New Transmission System Planning Tool:

In addition to identifying the need for fundamental changes in wholesale market design and ISO-NE governance, NESCOE’s Vision Statement¹ set forth a new framework for transmission planning in New England. That framework would provide the New England states with a scenario-based planning tool to inform “the potential use of transmission to integrate all of the necessary energy resources in the region at the lowest cost possible[.]”² The Vision Statement noted that, “[to] the extent necessary, ISO-NE should work with States and stakeholders to revise ISO-NE’s tariff to reflect this planning approach.”

In furtherance of the Vision Statement, the Updated Work Plan includes a 2050 Transmission Study.³ Specifically, ISO-NE has committed to “conduct[ing] a high level transmission study for the year 2050 that informs the region of the amount and type of transmission infrastructure needed to cost effectively incorporate clean energy and distributed energy resources and to meet energy policy goals, including economywide decarbonization.”⁴

¹ http://nescoe.com/wp-content/uploads/2020/10/NESCOE_Vision_Statement_Oct2020.pdf.

² Vision Statement at 5.

³ Updated Work Plan at Slide 4.

⁴ *Id.*

NESCOE understands that a revised version of the Updated Work Plan will include specific reference to beginning discussions around developing related Tariff language to reflect this new transmission planning tool in this calendar year. NESCOE expresses its thanks to ISO-NE for that revision. Commencing Tariff work this calendar year is critical. While the 2050 Transmission Study is an important and welcome first step, it is a one-time act without accompanying Tariff changes to incorporate this planning tool systematically into ISO-NE's routine transmission study and planning efforts. We believe these process changes are necessary to help integrate clean energy resources at the lowest possible cost.

NESCOE looks forward to working with ISO-NE and others in the region to ensure that momentum for lasting transmission planning changes to facilitate the transition to a clean energy future is made actionable in the near-term.